

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

ASHLEY DIAMOND,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No.
	:	5:20-cv-00453-MTT
	:	
TIMOTHY WARD, <i>et al.</i> ,	:	
	:	
Defendants.	:	

**DEFENDANTS’ NOTICE OF FILING AND CERTIFICATE
OF NEED FOR FILING DISCOVERY**

Defendants Timothy Ward, Sharon Lewis, Javel Jackson, Ahmed Holt, Robert Toole, Benjamin Ford, Jack Sauls, Brooks Benton, and Grace Atchison, through counsel, and as further support for their response to Plaintiff’s motion for preliminary injunction, file herewith a copy of the Deposition of Porshe Moody, taken on February 25, 2022.

Pursuant to Local Rule 5.1, undersigned counsel certifies that their response to Plaintiff’s motion for preliminary injunction is based in part on the attached deposition.

Respectfully submitted,

Christopher M. Carr 112505
Attorney General

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Deputy Attorney General

s/ Roger A. Chalmers
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PLEASE ADDRESS ALL
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CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Andrea Chinyere Ezie
Elizabeth Littrell
Scott D. McCoy
Maya Gyan Rajaratnam

This 28th day of February, 2022.

s/ Roger A. Chalmers
Roger A. Chalmers



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Transcript of Porshe Moody

Date: February 25, 2022

Case: Diamond -v- Ward, et al.

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1 UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF GEORGIA
3 MACON DIVISION

4 -----x
5 ASHLEY DIAMOND,
6 Plaintiff, Civil Action No.
7 v. 5:20-CV-00453-MTT
8 TIMOTHY WARD, et al.
9 Defendants.

10 -----x

11
12 VIDEOTAPED DEPOSITION OF:
13 PORSHE MOODY

14
15
16 TRANSCRIPT OF TESTIMONY, as
17 reported by Nancy C. Bendish, Certified Court
18 Reporter, RMR, CRR and Notary Public of the
19 States of New York and New Jersey, conducted
20 virtually via Zoom Videoconference on Friday,
21 February 25, 2022, commencing at 9:18 a.m. EST.
22
23
24
25

Transcript of Porshe Moody
Conducted on February 25, 2022

2

1 A P P E A R A N C E S :

2 (All participated remotely via
3 Zoom Videoconference)

4
5 ON BEHALF OF PLAINTIFF ASHLEY DIAMOND:

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23
24 ALSO PRESENT:

25
26 NATALIE HOPE, Planet Depos Technician
27
28 KEVIN DeRITA, Planet Depos Videographer

Transcript of Porshe Moody
Conducted on February 25, 2022

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I N D E X

WITNESS	EXAMINATION
PORSHE MOODY	
By Mr. Fleisher.....	5, 86
By Mr. Chalmers.....	59, 87

E X H I B I T S

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Transcript of Porshe Moody
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1	THE VIDEOGRAPHER: Here begins	09:24:33
2	disk number 1 in the remote video deposition of	09:31:42
3	Porshe Moody in the matter styled Diamond versus	09:31:45
4	Ward in the U.S. District Court, Middle District	09:31:50
5	of Georgia, Macon Division. Case No. is	09:31:53
6	5:20-CV-00453-MIT.	09:31:59
7	Today is Friday, February 25th,	09:32:01
8	2022. My name is Kevin DeRita representing	09:32:04
9	Planet Depos. All parties of this video	09:32:08
10	deposition are attending remotely.	09:32:10
11	Will counsel please identify	09:32:13
12	themselves and state whom they represent for the	09:32:14
13	record.	09:32:16
14	MR. FLEISHER: Good morning.	09:32:16
15	Aaron Fleisher with the Southern Poverty Law	09:32:18
16	Center on behalf of plaintiff Ashley Diamond.	09:32:21
17	MR. CHALMERS: Good morning.	09:32:24
18	Roger Chalmers with the Georgia State Law	09:32:26
19	Department on behalf of Commissioner Ward and	09:32:29
20	the other named defendants in the action.	09:32:31
21	THE VIDEOGRAPHER: The court	09:32:34
22	reporter today is Nancy Bendish representing	09:32:35
23	Planet Depos. Will the reporter please swear in	09:32:50
24	the witness.	
25	///	

Transcript of Porshe Moody
Conducted on February 25, 2022

1 P O R S H E M O O D Y,

2 having been duly sworn by the

3 Court Reporter, testified as follows:

4 THE REPORTER: Please state your
5 full name for the record.

6 THE WITNESS: My full name is 09:32:55
7 Porshe Lashea Moody. 09:32:56

8 THE REPORTER: Thank you. You may
9 begin.

10 MR. FLEISHER: Thank you, Ms.
11 Bendish.

12 EXAMINATION BY MR. FLEISHER:

13 Q. Good morning, Ms. Moody. 09:33:11

14 A. Good morning. 09:33:11

15 Q. Again, my name is Aaron Fleisher. 09:33:13

16 I'm a lawyer representing Ashley Diamond, who's 09:33:16

17 the plaintiff in this action. I should note my 09:33:19

18 colleague, Jessica Stone, is also on this call. 09:33:22

19 I don't think she identified herself before. 09:33:26

20 She is also with the Southern Poverty Law 09:33:28

21 Center. And I will say we may have one or two 09:33:34

22 other folks from our office who are representing 09:33:37

23 Ashley Diamond join. I don't know if they will 09:33:40

24 be or not, but if they do I will try to -- if I 09:33:44

25 see them pop up, make that clear for everyone on 09:33:47

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	the call.	09:33:50
2	Ms. Moody, I want to make it	09:33:50
3	clear, you are not a defendant in this case.	09:33:53
4	We've asked you to come in today because we	09:33:54
5	believe you may have some relevant information	09:33:57
6	concerning Ms. Diamond.	09:33:59
7	Do you understand that?	09:34:01
8	A. Um-hum. I do.	09:34:02
9	Q. Thank you. One thing, because we	09:34:03
10	have a court reporter, Ms. Bendish, who's taking	09:34:05
11	down what we say, I would ask you to give verbal	09:34:07
12	answers. So, you know, nods or shrugs or um-hum	09:34:11
13	is hard for Ms. Bendish to take down, so if you	09:34:14
14	could give a yes or no.	09:34:18
15	A. Okay.	09:34:20
16	Q. Got that?	09:34:20
17	A. I've got it.	09:34:22
18	Q. Thank you. I know it's not	09:34:23
19	natural always, so it's a little hard.	09:34:23
20	Ms. Moody, are you represented by	09:34:25
21	an attorney?	09:34:27
22	A. I am not.	09:34:28
23	Q. Have you ever been deposed before?	09:34:28
24	A. I have not.	09:34:31
25	Q. Have you ever testified in any	09:34:33

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	criminal or civil proceeding?	09:34:35
2	A. No, sir.	09:34:37
3	Q. Okay. So, let me go over a few	09:34:38
4	sort of ground rules for the deposition with	09:34:42
5	you. We've already talked about giving verbal	09:34:45
6	answers and I believe Ms. Hope early on said,	09:34:48
7	she also asked that we don't speak over each	09:34:52
8	other. So I would ask that you allow me to	09:34:55
9	finish my questions before you answer; I'll try	09:34:58
10	to make sure I don't step on your toes and ask	09:35:00
11	questions before you finish answering. Does	09:35:03
12	that make sense?	09:35:06
13	A. It does.	09:35:07
14	Q. Okay, great, thank you.	09:35:08
15	I apologize if you hear a dog	09:35:09
16	barking in the background. My dog is unaware	09:35:12
17	that we're taking a deposition; gets a little	09:35:17
18	rambunctious at times, so I'm sorry about that.	09:35:19
19	Can you hear me okay?	09:35:23
20	A. I can.	09:35:24
21	Q. Ms. Moody, if you don't understand	09:35:25
22	a question, please let me know. If you do	09:35:27
23	answer my question I'll assume you understood;	09:35:29
24	does that make sense?	09:35:32
25	A. It does.	09:35:34

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	Q.	And you understand that you're	09:35:34
2		under oath?	09:35:36
3	A.	Yes, I do.	09:35:37
4	Q.	And that's the same oath you would	09:35:38
5		swear to if you were testifying in court. Do	09:35:42
6		you understand that?	09:35:45
7	A.	I do.	09:35:46
8	Q.	Is there any reason that you	09:35:46
9		wouldn't be able to give complete and honest	09:35:49
10		answers today?	09:35:52
11	A.	Mainly due to memory, it just	09:35:53
12		depends on how in detail a situation may be.	09:35:57
13	Q.	Okay. Are you under the influence	09:36:00
14		of any drugs or alcohol?	09:36:03
15	A.	No, sir.	09:36:05
16	Q.	So there's nothing sort of	09:36:06
17		impairing you today?	09:36:08
18	A.	No, sir, it's not.	09:36:09
19	Q.	Great, thank you. And I	09:36:11
20		understand memories fade over time, so that	09:36:14
21		makes complete sense.	09:36:17
22		Can I ask where you are testifying	09:36:18
23		from?	09:36:20
24	A.	I am -- what city and state?	09:36:21
25	Q.	Sorry, I mean are you at home, are	09:36:24

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	you in an office; where are you?	09:36:26
2	A. Yes, I'm in an office, currently	09:36:28
3	at work, just taking a break to conduct this.	09:36:31
4	Q. Okay. And are you by yourself in	09:36:35
5	the office?	09:36:37
6	A. Yes, I am by myself. The door is	09:36:38
7	shut and I also have on a sound, like a quiet	09:36:43
8	noise outside my office.	09:36:49
9	Q. Understood, thank you.	09:36:50
10	If anyone comes into the office	09:36:52
11	during the deposition, will you please let us	09:36:54
12	know?	09:36:57
13	A. I will. I will. My door is	09:36:57
14	currently locked as well.	09:37:00
15	Q. Okay, thank you. And will you	09:37:02
16	agree to keep your audio and video on while	09:37:04
17	we're on the record during the deposition?	09:37:07
18	A. Yes, sir.	09:37:09
19	Q. And do you understand the	09:37:10
20	deposition is being recorded?	09:37:11
21	A. Yes, sir, I understand.	09:37:13
22	Q. You understand that your testimony	09:37:15
23	could be used at trial in this case?	09:37:17
24	A. I do understand that as well.	09:37:20
25	Q. Great. And can I ask that while	09:37:23

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	we're on the record you don't communicate with	09:37:26
2	anyone else. Does that make sense?	09:37:28
3	A. Yes, sir.	09:37:31
4	Q. Do you have any other programs	09:37:32
5	besides the Zoom that we're using for the	09:37:33
6	deposition up on your computer?	09:37:36
7	A. No, sir.	09:37:38
8	Q. Okay. If anything pops up on your	09:37:39
9	screen, will you let us know?	09:37:43
10	A. I will.	09:37:45
11	Q. Thank you.	09:37:45
12	Do you have any other electronic	09:37:47
13	devices with you right now other than your	09:37:49
14	computer of course?	09:37:52
15	A. I have my cell phone with me.	09:37:53
16	Q. Okay. Can I ask that you turn	09:37:57
17	that off while we're on the record today?	09:37:59
18	A. Yes, sir.	09:38:01
19	Q. Thank you.	09:38:02
20	A. No problem.	09:38:04
21	Q. So, I understand you're at work.	09:38:06
22	If there's any kind of interruption and you need	09:38:12
23	a break or you need a break for any other	09:38:15
24	reason, you want to use the facilities, please	09:38:18
25	just let me know. We can take a break at any	09:38:20

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	time.	09:38:22
2	The one thing I would ask is that	09:38:22
3	if I've asked a question, you answer the	09:38:24
4	question before we take a break. Does that make	09:38:26
5	sense?	09:38:28
6	A. It does.	09:38:29
7	Q. Okay. And I'll try to take breaks	09:38:29
8	at fairly regular intervals as well so we can	09:38:34
9	all catch our breath and use the facilities.	09:38:37
10	If you have any kind of connection	09:38:42
11	issues, actually I would normally ask you to	09:38:46
12	contact your counsel.	09:38:49
13	Planet Depos people, if Ms. Moody	09:38:51
14	has connection issues, is there someone she	09:38:53
15	should reach out to during the deposition?	09:38:56
16	THE TECHNICIAN: I can leave my	09:39:01
17	contact information in the chat and she can	09:39:03
18	reach out to me directly and I can help get her	09:39:05
19	reconnected.	09:39:09
20	MR. FLEISHER: Thank you, Ms.	09:39:09
21	Hope. Is that okay, Ms. Moody?	09:39:10
22	THE WITNESS: Yes, that's okay.	09:39:12
23	MR. FLEISHER: Hopefully we won't	09:39:13
24	have any of those technical issues.	09:39:14
25	///	09:39:14

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	BY MR. FLEISHER:	09:39:16
2	Q. Finally, I would just note	09:39:16
3	Mr. Chalmers may make objections to some of my	09:39:19
4	questions. If he does, once he's made the	09:39:21
5	objection, you can go please ahead and answer	09:39:25
6	the question. Does that make sense?	09:39:26
7	A. Yes.	09:39:28
8	Q. Great. Do you have any questions	09:39:29
9	for me?	09:39:32
10	A. Not right now.	09:39:33
11	Q. Did you bring any notes or	09:39:36
12	documents with you to the deposition today?	09:39:38
13	A. I did not.	09:39:41
14	Q. Do you have any concern about	09:39:43
15	speaking about Ms. Diamond in this case today?	09:39:45
16	A. No personal concerns.	09:39:50
17	Q. What do you mean by personal	09:39:53
18	concerns?	09:39:56
19	A. I don't have any -- I don't have	09:40:02
20	any concerns with me, just for the case in	09:40:05
21	general.	09:40:08
22	Q. Okay. I'm not sure what that	09:40:10
23	means. Could you explain.	09:40:12
24	A. This is my first time, so I think	09:40:14
25	it's just my nerves. I don't know what to	09:40:16

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	expect, that sort of thing, but, no, I don't	09:40:20
2	have any concerns.	09:40:22
3	Q. Okay, understood. Thank you.	09:40:23
4	Where are you currently employed,	09:40:27
5	Ms. Moody?	09:40:29
6	A. [REDACTED]	09:40:30
7	[REDACTED]	09:40:35
8	Q. How long have you been --	09:40:37
9	A. I'm sorry.	09:40:39
10	Q. Go ahead.	09:40:39
11	A. I'm sorry. Mainly, I've been here	09:40:40
12	since May of 2021.	09:40:43
13	Q. And where did you work before	09:40:47
14	that?	09:40:49
15	A. Before that I was employed at	09:40:49
16	Coastal State Prison as a counselor there.	09:40:52
17	Q. And let's go back a little. Can	09:40:58
18	you talk about your educational background.	09:41:00
19	A. Yes, sir.	09:41:03
20	I got a -- received a Bachelor's	09:41:05
21	Degree in social work, went back and received my	09:41:10
22	Masters of social work at Savannah State	09:41:12
23	University. I've worked mainly in social work	09:41:18
24	since I've graduated.	09:41:24
25	Worked as a mental health	09:41:26

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	counselor at the Department, at the Savannah	09:41:29
2	RYDC, dealing with juveniles; went back into the	09:41:34
3	community to do fill work such as working for	09:41:40
4	the Rape Crisis Center and then I went back to	09:41:44
5	Coastal working for the state.	09:41:48
6	Q. Okay. And you said RYDC. Can you	09:41:50
7	tell us what that stands for?	09:41:55
8	A. Savannah Regional Youth Detention	09:41:55
9	Center.	09:42:00
10	Q. I see, okay.	09:42:02
11	So, your time at Coastal, when did	09:42:02
12	that begin?	09:42:04
13	A. That began in January of 2019.	09:42:07
14	Q. So did you work there continuously	09:42:11
15	from January 2019 till May of 2021?	09:42:14
16	A. Yes, sir.	09:42:18
17	Q. And -- sorry. Before Coastal, or	09:42:19
18	January of 2019, where were you working?	09:42:22
19	A. I worked with the Rape Crisis	09:42:27
20	Center and I also worked with the Savannah Youth	09:42:30
21	Detention Center. Before that I did jobs that	09:42:34
22	were not necessarily in the field, such as	09:42:39
23	working at a gym, training and coaching, but as	09:42:41
24	far as social work-related jobs, those were the	09:42:45
25	two jobs that I had.	09:42:49

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	Q.	Did you work at any other prisons	09:42:50
2		besides Coastal Prison?	09:42:54
3	A.	No, sir.	09:42:58
4	Q.	So you worked for GDC then for,	09:43:00
5		looks like a little over two years, January 2019	09:43:03
6		to May of 2021; is that right?	09:43:06
7	A.	Yes. Yes, sir.	09:43:08
8	Q.	What were your -- you mentioned	09:43:11
9		you were a counselor; is that correct, at	09:43:13
10		Coastal?	09:43:16
11	A.	Yes, sir. I had held many	09:43:16
12		responsibilities. I was also a part of the PREA	09:43:19
13		team, which is the Prison Rape Elimination Act.	09:43:22
14		I was a general counselor for any	09:43:29
15		offender, so I did their intake when they first	09:43:33
16		came in, their orientation, and then later in my	09:43:38
17		last year of working there I became a release	09:43:41
18		counselor, so I dealt with offenders that were	09:43:45
19		getting released.	09:43:50
20	Q.	Okay. So your positions were	09:43:51
21		general counselor, then release counselor and	09:43:53
22		PREA team member; am I getting that right?	09:43:56
23	A.	Yes, sir.	09:43:59
24	Q.	Any other positions you held at	09:44:00
25		Coastal?	09:44:03

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	A.	I didn't really hold a position,	09:44:04
2		and just because it's relevant to this case, I	09:44:07
3		was head of the transgender population that was	09:44:11
4		later started at Coastal State Prison.	09:44:15
5	Q.	Okay, I'd like to come back to	09:44:20
6		that later. I appreciate you mentioning that.	09:44:22
7		Were you part of the mental health	09:44:27
8		team at Coastal?	09:44:32
9	A.	No, sir. No, sir. But we had a	09:44:33
10		very good working relationship, but I was not a	09:44:40
11		part of the mental health team. I've had	09:44:42
12		experience in mental health, but that was not my	09:44:44
13		position at Coastal State Prison.	09:44:47
14	Q.	So what would you have been, sort	09:44:50
15		of, classified as if not mental health or sort	09:44:52
16		of medical --	09:44:56
17	A.	Um --	09:44:56
18	Q.	Sorry.	09:44:57
19	A.	I'm sorry.	09:44:58
20		Basically it would be considered	09:44:59
21		the general counselor. So every offender that	09:45:01
22		is an offender at Coastal State Prison, everyone	09:45:05
23		gets assigned a counselor upon their	09:45:08
24		orientation. So I was a part of that team. So	09:45:11
25		I was a counselor to all offenders, whether they	09:45:13

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	had a mental health disorder or not.	09:45:16
2	So that's the difference with the	09:45:18
3	mental health counselors. The mental health	09:45:21
4	counselors are only counselors to offenders with	09:45:23
5	a diagnosed mental health disorder.	09:45:26
6	Q. I see.	09:45:28
7	Who did you report to while you	09:45:29
8	worked at Coastal?	09:45:31
9	A. My overhead was -- should I list	09:45:36
10	everyone? Because there were changes in	09:45:42
11	leadership.	09:45:46
12	Q. Yeah, if you could list throughout	09:45:47
13	your time, I would appreciate it. Thank you.	09:45:50
14	A. Okay. My first supervisor, which	09:45:53
15	would be the head over all of the counselors,	09:45:57
16	which is the Care and Treatment Director, was	09:46:00
17	Ms. Cynthia Rivers. And later after her it was	09:46:04
18	Mr. Carl Betterson.	09:46:10
19	Q. Were those the only two?	09:46:13
20	A. Yes, sir.	09:46:16
21	Q. And they were, you said the head	09:46:17
22	of care and treatment; am I getting that right?	09:46:20
23	A. Yes, sir.	09:46:23
24	Q. Did anyone report to you?	09:46:25
25	A. No, sir. My position there, I was	09:46:27

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	a Counselor II. So in order of hierarchy, there	09:46:30
2	was Counselor I, Counselor II, and we had a	09:46:36
3	Counselor III and then it was the Assistant	09:46:40
4	Warden of Care and Treatment.	09:46:46
5	Q. And the Assistant Warden of Care	09:46:47
6	and Treatment was Ms. Rivers and then	09:46:52
7	Mr. Betterson?	09:46:54
8	A. Yes, sir.	09:46:55
9	Q. And when you say there was a	09:46:55
10	Counselor I, Counselor II, Counselor III, was	09:46:56
11	there just one of each of those positions?	09:46:58
12	A. No, sir. There were several -- I	09:47:00
13	want to say we had -- and again, there were a	09:47:02
14	lot of changes with the amount of employees	09:47:03
15	throughout my entire time there. So we would	09:47:05
16	have maybe two to three Counselor I's. The	09:47:09
17	majority of the counselors were Counselor IIs	09:47:13
18	and we had one Counselor III, which would be	09:47:15
19	considered a supervisor. Only they were only	09:47:18
20	over a certain amount of the Counselor IIs.	09:47:21
21	Q. Would you have sort of regular	09:47:28
22	meetings among this group of counselors?	09:47:30
23	A. Yes. Occasionally.	09:47:33
24	Q. How often, would you say?	09:47:36
25	A. There were times where we met at	09:47:38

Transcript of Porshe Moody
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19

1	least once a week, once a month, but we always	09:47:41
2	had one once a month.	09:47:46
3	Q. What was the purpose of those	09:47:47
4	meetings?	09:47:48
5	A. The meetings were basically to	09:47:50
6	case manage. Things are always constantly	09:47:52
7	changing, new regulations, new policy, to go	09:47:57
8	over SOP, to answer any questions that a	09:48:00
9	counselor may have. Just the various day-to-day	09:48:02
10	tasks.	09:48:07
11	Q. Ms. Moody, are you familiar with	09:48:09
12	Ashley Diamond?	09:48:11
13	A. I am.	09:48:13
14	Q. And who is Ashley Diamond?	09:48:13
15	A. Ashley Diamond was an offender	09:48:19
16	that was assigned to my caseload when she first	09:48:20
17	came to Coastal.	09:48:23
18	Q. Do you remember approximately when	09:48:25
19	that was?	09:48:27
20	A. I do not, I'm sorry.	09:48:29
21	Q. That's all right. No need to	09:48:31
22	apologize.	09:48:33
23	Do you remember if you -- did you	09:48:33
24	hear anything about Ashley Diamond before you	09:48:36
25	met her?	09:48:39

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1	A.	I did.	09:48:40
2	Q.	What did you hear?	09:48:41
3	A.	There was a briefing before	09:48:46
4		Diamond came, and then it was basically a	09:48:51
5		discussion of what should we do as far as	09:48:55
6		planning, what was going to happen, as far as	09:48:58
7		her location, who would be assigned over her,	09:49:02
8		and that's when I found out that my supervisor	09:49:05
9		thought that I would be the best fit out of all	09:49:08
10		of the counselors to be assigned to Ashley	09:49:11
11		Diamond.	09:49:16
12		It was, I want to say, a careful	09:49:17
13		situation. There was a lot of planning and	09:49:20
14		strateging (sic) with making sure she stayed	09:49:23
15		safe. So, I was definitely briefed on Ashley	09:49:27
16		Diamond.	09:49:30
17	Q.	You say it was a careful	09:49:31
18		situation; is that what you said?	09:49:34
19	A.	Yes, sir. Being that in the past,	09:49:37
20		the past things that happened in her first	09:49:42
21		incarceration, even though she wasn't at	09:49:46
22		Coastal, but just the fact that, you know, we	09:49:49
23		didn't want to repeat the same mistakes from the	09:49:52
24		first time.	09:49:55
25	Q.	What kind of things are you	09:49:55

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1	referring to that happened?	09:49:57
2	A. Like I said, the main thing was	09:49:58
3	her safety, you know, making sure that she	09:50:00
4	wasn't around really aggressive offenders there.	09:50:05
5	You know, what would be a safe location for her.	09:50:12
6	Q. Who was in that briefing that you	09:50:14
7	talked about?	09:50:17
8	A. I honestly can't remember if it	09:50:17
9	was just me with my supervisor or if it was --	09:50:19
10	and I want to say it was with everyone. They	09:50:25
11	wanted to make sure everyone was aware, you	09:50:30
12	know, the precautions that we would have to make	09:50:33
13	sure was in place.	09:50:36
14	Q. Sorry. By everyone, do you	09:50:38
15	mean --	09:50:41
16	A. The counselors, during our monthly	09:50:41
17	meetings.	09:50:44
18	Q. And you mentioned your supervisor	09:50:44
19	at the time. Was that Ms. Rivers?	09:50:47
20	A. I do believe that it was	09:50:49
21	Mr. Betterson at the time that Diamond came.	09:50:51
22	Q. Okay. So, am I correct in saying	09:50:56
23	Mr. Betterson was in the briefing? Others may	09:51:00
24	have been but you're not sure; is that what	09:51:04
25	you're saying?	09:51:06

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22

1	A.	Yes, but I want to say that others	09:51:07
2		were there, other counselors were there.	09:51:09
3	Q.	And what type of -- what did you	09:51:12
4		discuss at the briefing?	09:51:15
5	A.	Just that this was an offender	09:51:18
6		that was transgender, that we needed to be	09:51:25
7		careful with our pronouns when addressing Ms.	09:51:29
8		Diamond; and basically getting, I guess,	09:51:32
9		everyone on the same page as far as security as	09:51:37
10		it relates to the counselors. Everybody that	09:51:40
11		would be in an interaction with Ashley Diamond.	09:51:43
12	Q.	When you say be careful with your	09:51:47
13		pronouns, can you explain what you mean by that?	09:51:49
14	A.	Being that Diamond preferred to be	09:51:54
15		given female pronouns and not male pronouns.	09:51:59
16	Q.	So did you use female pronouns for	09:52:04
17		Ms. Diamond?	09:52:07
18	A.	Yes, sir.	09:52:08
19	Q.	Did others?	09:52:09
20	A.	I would be lying if I said	09:52:10
21		everyone did. And I don't want to say that it	09:52:12
22		was out of viciousness, but just out of habit.	09:52:18
23	Q.	Were there any other discussions	09:52:27
24		you remember about Ms. Diamond before you met	09:52:29
25		her?	09:52:31

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24

1	Diamond were the most frequent that you	09:53:44
2	remember; is that what you're saying?	09:53:46
3	A. Yes, sir.	09:53:48
4	Q. Anyone else you talked to about	09:53:49
5	Ms. Diamond before you met her?	09:53:52
6	A. No, sir.	09:53:55
7	Q. When was the last time, if you	09:53:59
8	remember, that you had any contact with Ms.	09:54:01
9	Diamond?	09:54:03
10	A. I would have to say it was during	09:54:11
11	one of our meetings. I had created a meeting	09:54:13
12	every week for all of the transgenders that we	09:54:16
13	had. So I want to say that was the last	09:54:19
14	interaction that we had, was during a meeting.	09:54:22
15	Q. And would that have been around	09:54:24
16	the time you left Coastal in May 2021?	09:54:26
17	A. Yes.	09:54:30
18	Q. You mentioned all the	09:54:31
19	transgenders. How many were there?	09:54:34
20	A. We had about seven, approximately	09:54:38
21	seven that may refer to themselves as	09:54:40
22	transgenders.	09:54:49
23	Q. Just to make sure I'm clear, is	09:54:50
24	that transgender women? In other words, people	09:54:53
25	who were born male but identified as female?	09:54:56

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25

1	A.	In a sense. Everyone didn't	09:55:02
2		classify as that.	09:55:04
3	Q.	Okay. How else did they classify?	09:55:05
4	A.	Well, and what I mean by that is	09:55:09
5		some men wanted to change -- like, all of them	09:55:15
6		weren't technically on female hormones. They	09:55:20
7		just had different lifestyles but they all had	09:55:25
8		the same ideology of living as a female, I guess	09:55:27
9		you can say. It's kind of hard to explain, but	09:55:33
10		they were all different in their own way. Not	09:55:35
11		everyone identified as, you know, wanting to be	09:55:39
12		female or some of them just took on certain	09:55:43
13		characteristics of a female rather than	09:55:46
14		everything.	09:55:51
15	Q.	I see. Were there others -- did	09:55:52
16		Ms. Diamond identify, to your knowledge, as a	09:55:55
17		female?	09:55:59
18	A.	Yes.	09:56:00
19	Q.	Were there others who identified	09:56:01
20		sort of fully as a female?	09:56:03
21	A.	Yes.	09:56:05
22	Q.	Approximately how many; do you	09:56:06
23		remember?	09:56:07
24	A.	About two others.	09:56:11
25	Q.	So during the time that you knew	09:56:13

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1	Ms. Diamond at Coastal, it sounds like, am I	09:56:20
2	correct, that you met with her weekly?	09:56:23
3	A. Yes, sir.	09:56:26
4	Q. Was that consistent?	09:56:27
5	A. Yes.	09:56:29
6	Q. And how would you describe Ms.	09:56:32
7	Diamond's gender expression?	09:56:34
8	A. I'm not sure what you mean.	09:56:39
9	Q. Her sort of outward presentation;	09:56:42
10	how would you describe that?	09:56:45
11	A. As a woman. I mean, yeah, she	09:56:48
12	identified as -- yeah.	09:56:54
13	Q. Did Ms. Diamond ever express any	09:57:00
14	concerns to you about her placement --	09:57:03
15	MR. CHALMERS: Objection, leading.	09:57:10
16	Q. -- to where she was?	09:57:14
17	MR. CHALMERS: Objection, form.	09:57:15
18	Q. You can answer, Ms. Moody.	09:57:17
19	A. She did. I wouldn't say	09:57:19
20	everything was technically for the right reasons	09:57:26
21	or -- she expressed concerns about her	09:57:34
22	placement, but it wasn't -- everything that she	09:57:38
23	expressed wasn't directly in concerns with	09:57:42
24	keeping her safe. Yeah.	09:57:46
25	Q. Did she ever express concerns	09:57:50

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1	about her mental health?	09:57:53
2	MR. CHALMERS: Objection, leading.	09:57:55
3	Counsel, you're leading the	09:57:56
4	witness and this is improper.	09:57:58
5	MR. FLEISHER: Mr. Chalmers, you	09:58:00
6	can make your objections; they're noted. Please	09:58:01
7	refrain from making speaking objections.	09:58:04
8	MR. CHALMERS: I'm not making a	09:58:07
9	speaking objection; I'm simply trying to alert	09:58:08
10	you that I'm going to object frequently if you	09:58:10
11	continue to lead the witness. I'd like you not	09:58:12
12	to do that.	09:58:15
13	MR. FLEISHER: Understood and	09:58:15
14	noted.	09:58:16
15	Q. Go ahead, Ms. Moody.	09:58:17
16	A. Concerns about her mental health,	09:58:19
17	she did make a concern about her mental health.	09:58:24
18	Q. How often?	09:58:29
19	A. It was literally when something	09:58:36
20	happened that she didn't necessarily like. And	09:58:39
21	I say that because in the meetings that we had	09:58:43
22	where she was open and could be free amongst the	09:58:48
23	other transgenders, it wasn't necessarily a big	09:58:53
24	concern of hers, but it would just be when I met	09:58:57
25	with her after a situation had arrived, and	09:59:03

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1	that's when she expressed it to me.	09:59:07
2	Q. What kind of situation are you	09:59:11
3	referring to?	09:59:12
4	A. There was a concern about -- one	09:59:14
5	would be her placement that she can't -- she	09:59:22
6	doesn't have anyone like her that she can talk	09:59:25
7	to because there was no one else in her dorm	09:59:28
8	that identified the same way she did, and that	09:59:31
9	was one of the main reasons for me to create	09:59:35
10	that group for her, so that she could have that	09:59:37
11	outlet at least once a week.	09:59:41
12	The other one was that cameras	09:59:45
13	were, you know, watching her every move and she	09:59:49
14	would make suggestions that that drives her	09:59:54
15	crazy, to constantly know that she has, or is	09:59:58
16	being watched.	10:00:01
17	Q. Did you bring these concerns to	10:00:02
18	anyone else?	10:00:04
19	A. Yes, sir. I made a report every	10:00:05
20	week that was usually drafted in an email to my	10:00:09
21	supervisor and the warden.	10:00:14
22	Q. So your supervisor again, just for	10:00:16
23	clarity, was Mr. Betterson?	10:00:21
24	A. Yes, sir.	10:00:23
25	Q. And the warden was Mr. Benton?	10:00:23

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1	A.	Yes.	10:00:27
2	Q.	Did you get responses to those	10:00:27
3		emails?	10:00:29
4	A.	Sometimes I did; sometimes it was	10:00:29
5		just a notification for them.	10:00:32
6	Q.	What were the responses that you	10:00:36
7		got?	10:00:38
8	A.	There was one where I reported	10:00:42
9		Diamond saying that her lock on her door to her	10:00:46
10		cell wasn't working. So it would just be	10:00:51
11		responses of, okay, we'll check into that or,	10:00:57
12		okay, we checked the lock on this day, it was	10:01:00
13		working fine.	10:01:04
14		Well -- just kind of responses,	10:01:08
15		just to give me updates that, okay, it's noted	10:01:10
16		and this is what we did or check with Diamond	10:01:13
17		about X, Y and Z.	10:01:17
18	Q.	You doing okay, Ms. Moody?	10:01:21
19	A.	I am.	10:01:23
20	Q.	Okay, great. Again, just let me	10:01:24
21		know if you need a break at any point.	10:01:26
22	A.	Okay.	10:01:29
23	Q.	I want to turn to the -- you	10:01:29
24		talked about this group that you created. Can	10:01:30
25		you tell us more about the group?	10:01:32

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1	A.	We just coined it a transgender	10:01:35
2		group. Well, actually, the name of it was the	10:01:39
3		Alternative Lifestyle Group because, again, like	10:01:41
4		I said, everyone didn't identify as a	10:01:44
5		transgender female but they lived alternative	10:01:46
6		lifestyles.	10:01:51
7		We had some men that, you know,	10:01:53
8		identified as a man but would like to put makeup	10:01:55
9		on, but still didn't really specify what	10:01:59
10		pronouns they would like to be called or that it	10:02:04
11		was, you know, necessary to call them a female.	10:02:07
12		So basically within those groups	10:02:11
13		they just got a chance to see each other because	10:02:13
14		they all weren't housed in the same area. They	10:02:18
15		were separated, you know, for a reason and so we	10:02:23
16		just used that time to just open and talk about	10:02:26
17		whatever they wanted to talk about. They	10:02:29
18		colored, they just did certain things to express	10:02:32
19		themselves because that was the main issue with	10:02:36
20		being an offender at Coastal, they weren't	10:02:38
21		allowed to wear makeup or express themselves	10:02:42
22		like they would have wanted to or did before the	10:02:46
23		incarceration.	10:02:50
24	Q.	Who created the group?	10:02:51
25	A.	I did.	10:02:53

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1	Q.	How often would it meet?	10:02:53
2	A.	Once a week.	10:02:56
3	Q.	When did you create it?	10:02:58
4	A.	I cannot recall the exact date	10:03:01
5		that it started, but it was definitely right	10:03:06
6		around the same time that Ms. Diamond got there.	10:03:09
7	Q.	So you slowed down a lot for me.	10:03:13
8		I don't know if that happened for anyone else.	10:03:17
9		I'm just trying to figure out if that's my	10:03:19
10		computer or yours.	10:03:21
11	MR. CHALMERS:	No, it was Ms.	10:03:23
12		Moody, I believe; it happened for me as well.	10:03:24
13	MR. FLEISHER:	Okay, thank you,	10:03:24
14		Mr. Chalmers.	10:03:28
15	THE WITNESS:	I'm sorry.	10:03:28
16	MR. FLEISHER:	No, it's not your	10:03:29
17		fault at all. It's a technical issue. I just	10:03:30
18		want to make sure -- I just wanted to figure out	10:03:33
19		whose end it was on, monitor it and if it	10:03:37
20		happens again, you know, we can figure out.	10:03:39
21	MR. CHALMERS:	I didn't mean to	10:03:41
22		blame you, Ms. Moody, but it's the equipment on	10:03:43
23		your end.	10:03:45
24	THE WITNESS:	Okay.	10:03:45
25	MR. CHALMERS:	-- one of us.	10:03:48

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1	THE WITNESS: Do I need to repeat	10:03:51
2	myself?	10:03:56
3	MR. FLEISHER: I think we got it.	10:03:57
4	Did you get it, Ms. Bendish?	10:03:58
5	THE REPORTER: I did.	10:04:01
6	BY MR. FLEISHER:	10:04:02
7	Q. Sorry, Ms. Moody, did you say it	10:04:02
8	was called the Alternative Lifestyle Group?	10:04:05
9	A. Yes, sir.	10:04:10
10	Q. Who named it that?	10:04:10
11	A. One of the other offenders in the	10:04:12
12	group.	10:04:14
13	Q. When you say other offenders, do	10:04:15
14	you mean other than Ms. Diamond?	10:04:18
15	A. Yes.	10:04:19
16	Q. Other than the offenders and	10:04:24
17	yourself, did anyone attend those meetings?	10:04:26
18	A. Sometimes we would have counselors	10:04:30
19	come in, and which I sort of welcomed it in a	10:04:32
20	way, just to -- there were concerns when we were	10:04:39
21	meeting that Ms. Diamond was recruiting other	10:04:43
22	offenders to, you know, join in on creating this	10:04:51
23	atmosphere of, you know, a lawsuit.	10:04:58
24	So, I made the rule in the group	10:05:03
25	that we weren't to talk about that. The group	10:05:05

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1 was managed, they weren't there by themselves, 10:05:13
2 so that was one of the rules in the group was 10:05:18
3 they weren't to talk about any type of outside 10:05:21
4 things that weren't on the topic of whatever 10:05:23
5 that topic was for that meeting. 10:05:28

6 So some counselors, you know, 10:05:32
7 wanted to come sit in. The supervisor and the 10:05:33
8 warden had sat in on some of the meetings just 10:05:37
9 to, you know, monitor it, which I welcomed, but 10:05:40
10 I also told them, you know, that if they didn't 10:05:44
11 feel comfortable talking as openly -- because 10:05:47
12 some of them talked a lot about their childhood 10:05:50
13 and trauma that they've experienced, that if 10:05:53
14 they didn't feel open, that they didn't have to 10:05:56
15 share when we had a visitor but, yes, we did 10:05:58
16 have outside visitors. 10:06:01

17 Q. You mentioned the warden sat in. 10:06:03
18 Which warden was that? 10:06:05

19 A. Benton. 10:06:08

20 Q. Did Warden Benton say anything 10:06:13
21 when he sat in? 10:06:16

22 A. Yes. He came to like the first 10:06:17
23 couple of meetings. He just wanted to make sure 10:06:19
24 that they knew who he was, just in case they had 10:06:21
25 an issue, was targeted by any other offender, 10:06:25

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1	just to kind of let them know he was there and	10:06:32
2	who they needed to contact or reach out to in	10:06:35
3	case of anything.	10:06:37
4	Q. Did you ever discuss undergarments	10:06:44
5	in that group?	10:06:47
6	A. We did.	10:06:48
7	Q. Can you tell me what that	10:06:48
8	discussion was.	10:06:50
9	A. I was assigned to basically get a	10:06:51
10	list of approved items that they could have. So	10:06:54
11	I discussed that with everybody in the group. I	10:06:59
12	drew up a list and emailed it out to the	10:07:02
13	wardens, my supervisor included; and he	10:07:06
14	basically told them that he would, you know,	10:07:09
15	allow them to order certain undergarments but	10:07:13
16	that they had to have had that profile from a	10:07:19
17	psychiatrist, you know, that they identified as	10:07:23
18	transgender to get those. He wasn't going to	10:07:26
19	just allow anyone to order those undergarments	10:07:28
20	without the appropriate diagnosis.	10:07:32
21	Q. And when you say "he," sorry, just	10:07:34
22	to --	10:07:36
23	A. The warden, Benton.	10:07:36
24	Q. Warden Benton?	10:07:42
25	A. Yes, sir.	10:07:45

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1	Q.	Do you know if any of them had	10:07:45
2		that profile?	10:07:47
3	A.	Yes. Some of them did, but not	10:07:48
4		everyone.	10:07:50
5	Q.	Do you know if they got the	10:07:50
6		undergarments they requested?	10:07:52
7	A.	Yes, sir. There was always issues	10:07:54
8		with the timeliness of it, with the ordering,	10:07:56
9		but, yes, everyone eventually got their	10:08:01
10		undergarments.	10:08:09
11	Q.	Did you receive support from your	10:08:10
12		superiors in creating this group?	10:08:13
13	A.	I did get a lot of support from	10:08:18
14		them. It was, I want to say just -- I got a lot	10:08:21
15		of support from the superiors, but not every	10:08:32
16		employee that worked there.	10:08:35
17	Q.	Could you elaborate on what you	10:08:38
18		mean by that?	10:08:40
19	A.	Just comments we had. I want to	10:08:45
20		say in November it was National Pride Day and so	10:08:47
21		I allowed them to celebrate that day by, you	10:08:53
22		know, coloring a pride flag or making their own	10:08:57
23		pride flag, and as their expression I allowed	10:09:03
24		them to place those pictures on my door of my	10:09:05
25		office and just, you know, little comments	10:09:08

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	about, you know, that I'm doing too much or it	10:09:14
2	was different from the culture of Coastal State	10:09:20
3	Prison.	10:09:23
4	Q. Who did those comments come from?	10:09:24
5	A. Mainly some counselors and some	10:09:26
6	security officers, but none from supervisors or	10:09:30
7	superiors.	10:09:34
8	Q. The members of this group, are	10:09:40
9	they housed throughout the prison?	10:09:43
10	A. Yes, sir.	10:09:48
11	Q. Did you make any efforts to -- or,	10:09:49
12	pardon me.	10:09:53
13	Did you ever suggest that they be	10:09:54
14	housed together?	10:09:56
15	A. That was a suggestion of mine, but	10:09:58
16	it was denied, mainly because it was deemed to	10:10:05
17	cause more issues than it would solutions, if	10:10:11
18	they were all housed together.	10:10:17
19	Q. Who told you that?	10:10:19
20	A. That came from my warden, Benton.	10:10:21
21	Q. Do you remember approximately when	10:10:28
22	that was?	10:10:30
23	A. I don't remember exactly what	10:10:34
24	month it was, but it was when we started to get	10:10:37
25	multiple offenders that identified -- I want to	10:10:42

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1 say possibly in October of '19. 10:10:49

2 Q. Okay. You spoke before, I 10:10:56

3 believe, about sort of a weekly report you 10:11:04

4 submitted; is that right? 10:11:06

5 A. Yes, sir. 10:11:08

6 Q. Can you tell me more about that? 10:11:10

7 A. It was mainly, like I said, we 10:11:14

8 wanted to ensure the safety of Diamond, so there 10:11:16

9 was some weeks where I reported, you know, there 10:11:20

10 was no sexual PREAs -- there were no 10:11:22

11 allegations. Basically just a report on 10:11:29

12 anything that Diamond had to report, you know, 10:11:31

13 just based on any situation. 10:11:35

14 Sometimes it would be offender 10:11:39

15 hasn't received undergarments yet, still waiting 10:11:41

16 on the order. Just any type of notification as 10:11:45

17 to, you know, what happened or what to report 10:11:50

18 for that week. 10:11:53

19 Q. Who did you send those reports to? 10:11:55

20 A. I sent them to all of the deputy 10:11:58

21 wardens, including the warden. 10:12:01

22 Q. Who asked for the report; do you 10:12:05

23 know? 10:12:08

24 A. Warden Benton. He asked for them 10:12:09

25 with all departments. 10:12:12

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	Q.	Did you do those reports for any	10:12:15
2		other offenders besides Ms. Diamond?	10:12:17
3	A.	No, sir; only Ms. Diamond.	10:12:20
4	Q.	Do you remember when you started	10:12:23
5		submitting those reports?	10:12:25
6	A.	I want to say as soon as Diamond	10:12:27
7		entered Coastal.	10:12:31
8	Q.	And do you remember when you	10:12:33
9		stopped?	10:12:34
10	A.	When I was no longer working	10:12:35
11		there.	10:12:38
12	Q.	And what was done with the reports	10:12:39
13		once you submitted them?	10:12:43
14	A.	I'm not too sure what was done	10:12:45
15		with them, but it was basically sort of like a	10:12:49
16		virtual interdisciplinary team. Like I said, he	10:12:52
17		got reports from security, mental health; he got	10:12:58
18		reports from each department.	10:13:01
19	Q.	Did you ever get any response --	10:13:02
20		oh, go ahead.	10:13:03
21	A.	No. I was just about to say I'm	10:13:05
22		not too sure about what he did with those	10:13:07
23		reports, but as far as the responses, sometimes	10:13:09
24		I did, sometimes I didn't. It just depends on	10:13:12
25		what the report was.	10:13:16

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1	Q.	Did you ever attend any meetings	10:13:18
2		in which Ms. Diamond was discussed?	10:13:21
3		MR. CHALMERS: I'm going to object	10:13:30
4		to form. She's already explained there was one,	10:13:31
5		but...	10:13:34
6	Q.	Go ahead, Ms. Moody.	10:13:36
7	A.	We -- I mean, what -- we had	10:13:40
8		meetings. Some of them were with Ms. Diamond.	10:13:45
9	Q.	Okay, thanks. To be clear, I	10:13:48
10		should have specified.	10:13:51
11		Did you ever attend any meetings	10:13:52
12		where Ms. Diamond wasn't present but you	10:13:54
13		discussed Ms. Diamond?	10:13:57
14	A.	The only meeting that we discussed	10:13:58
15		with Diamond was, again, before she got to the	10:14:02
16		prison.	10:14:05
17	Q.	So once she was there, there were	10:14:06
18		no more?	10:14:08
19	A.	Not physical meetings. Like I	10:14:10
20		said, I don't know if you want to count the	10:14:12
21		reports as meetings or, you know, when we were	10:14:14
22		in the groups and a supervisor sat in on the	10:14:16
23		meetings.	10:14:20
24		MR. FLEISHER: Let's take a break,	10:14:29
25		if that's good for you, Ms. Moody.	10:14:31

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1	THE WITNESS: Okay.	10:14:34
2	MR. FLEISHER: I know you're at	10:14:35
3	work today. I don't want to take up too much of	10:14:35
4	your time, but I think it's a good point for a	10:14:38
5	break and then we can keep going. About ten	10:14:41
6	minutes, is that okay with you?	10:14:43
7	THE WITNESS: Yes, that's fine.	10:14:44
8	MR. FLEISHER: Mr. Chalmers,	10:14:46
9	that's all right with you?	10:14:49
10	MR. CHALMERS: Fine.	10:14:50
11	MR. FLEISHER: Everyone else good?	10:14:51
12	So, I have 10:14. Shall we round off and say	10:14:51
13	10:25 we'll come back?	10:14:55
14	THE WITNESS: Okay.	10:14:59
15	MR. FLEISHER: Thank you. Going	10:14:59
16	off the record.	10:15:00
17	THE VIDEOGRAPHER: The time is	10:15:00
18	10:14 a.m.; we are off the record. I am	10:15:04
19	stopping the recording now.	10:15:08
20	(Recess taken.)	10:15:18
21	THE VIDEOGRAPHER: The time is	10:26:26
22	10:26 a.m.; we are back on the record.	10:26:32
23	BY MR. FLEISHER:	10:26:35
24	Q. All right, Ms. Moody, hope you	10:26:36
25	were able to take a little breather and	10:26:39

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1 definitely don't want to keep you here too long, 10:26:44
2 so we'll keep moving through. 10:26:47
3 A. All right. 10:26:50
4 Q. Oh, do you remember your work 10:26:51
5 email address when you were at Coastal? 10:26:53
6 A. It is pmoody@gdc.ga.gov. 10:26:57
7 Q. So pmoody, p-m-o-o-d-y, all one 10:27:16
8 word? 10:27:18
9 A. Um-hum. 10:27:19
10 Q. Thank you. 10:27:20
11 I want to turn back to the 10:27:21
12 meetings at the Alternative Lifestyle Group; is 10:27:24
13 that the right term? 10:27:28
14 A. Yes, sir. 10:27:29
15 Q. We talked a little bit about 10:27:30
16 undergarments as a topic of conversation. What 10:27:33
17 else was discussed in those meetings? 10:27:36
18 A. You mean the group, the 10:27:40
19 Alternative Lifestyle Group meetings? 10:27:42
20 Q. Yes, thank you. 10:27:44
21 A. Like I said, it was -- the 10:27:46
22 meetings were just about the offenders. 10:27:50
23 Sometimes, like we started out with like a quote 10:27:53
24 of the day. So I had one offender basically 10:27:56
25 give like an inspirational quote. We talked 10:28:02

Transcript of Porshe Moody
Conducted on February 25, 2022

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1 about history, like pride history. They shared 10:28:06
2 their own personal stories. It was just really 10:28:10
3 like a group -- I was just there to facilitate, 10:28:13
4 so they really led the group. 10:28:16

5 Q. Any other topics you remember they 10:28:19
6 discussed? 10:28:24

7 A. They would also, you know, just 10:28:25
8 vent about certain officers or certain inmates 10:28:28
9 or, you know... but other than that, that was 10:28:33
10 it. 10:28:38

11 Q. And we talked before about a 10:28:38
12 suggestion you made that those offenders be 10:28:47
13 housed together? 10:28:50

14 A. Um-hum. 10:28:51

15 Q. Why did you make that suggestion? 10:28:52

16 A. Mainly because there were some -- 10:28:55
17 just to create like that separation. 10:29:04

18 In hindsight, looking back on it, 10:29:08
19 I don't think it would have been a good idea, 10:29:11
20 but just looking at that they were the minority 10:29:14
21 at that prison, but even by keeping them 10:29:18
22 separated, it would have caused even more 10:29:23
23 discrepancies, if they were all housed in one 10:29:30
24 building, rather than -- it would cause more 10:29:36
25 separation. 10:29:39

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1	Q.	All right. Turning back to Ms.	10:29:42
2		Diamond specifically, you talked about the	10:29:44
3		briefing you had before she came in.	10:29:51
4	A.	Um-hum.	10:29:53
5	Q.	And I think you talked about some	10:29:54
6		conversation about her previous term of	10:29:57
7		incarceration; is that right?	10:30:00
8	A.	Um-hum.	10:30:02
9	Q.	What did you know about her	10:30:02
10		previous term of incarceration?	10:30:04
11	A.	I didn't know much and, honestly,	10:30:06
12		I took it upon myself to Google what wasn't	10:30:10
13		stated, you know, in the briefing. So a lot of	10:30:14
14		it was my own research. Especially when I found	10:30:20
15		out that I would be her case manager, I briefed	10:30:26
16		myself on a lot. I don't personally live that	10:30:30
17		lifestyle, but I just basically had to get	10:30:34
18		familiar with what I needed to be effective for	10:30:38
19		them.	10:30:43
20	Q.	So what did you find out?	10:30:44
21	A.	I know that she was denied	10:30:46
22		hormones, and that was one of the main reasons	10:30:50
23		why that suit was effective, because that's --	10:30:55
24		and I do know about her being a victim of	10:31:04
25		several sexual acts during that time.	10:31:09

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1	Q.	Just to be clear, when you say she	10:31:13
2		and her, you're referring to Ms. Diamond?	10:31:16
3	A.	Yes, I am.	10:31:18
4	Q.	Thank you.	10:31:19
5		So you learned all that from your	10:31:23
6		own research?	10:31:25
7	A.	Yes, sir.	10:31:26
8	Q.	Did anyone tell you anything more	10:31:27
9		about it?	10:31:29
10	A.	I don't think people knew about	10:31:30
11		it. All they know is that -- the only thing	10:31:31
12		that was said, just amongst other employees or	10:31:35
13		supervisors, was that she won a lot of money.	10:31:40
14		There wasn't a specified amount, but that was	10:31:43
15		just the gist of it.	10:31:47
16	Q.	You talked before about being on	10:31:50
17		the PREA team. Can you tell us more about that,	10:31:52
18		what that role is, what that involves?	10:31:55
19	A.	Yes. So mainly my role in that,	10:31:58
20		sometimes I would assist with investigations and	10:32:04
21		just making sure that the paperwork was done in	10:32:07
22		a timely manner, and that no case was missed.	10:32:13
23		So I didn't -- I wasn't the investigator; I was	10:32:21
24		just the supportive -- I played the supportive	10:32:25
25		role in it.	10:32:28

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1 So, if an investigator had to talk 10:32:28
2 with an inmate, especially if -- excuse me -- 10:32:31
3 talk with an inmate, sometimes I would sit in on 10:32:36
4 that investigation, just to get more information 10:32:39
5 or to be a sense of support for the offender. 10:32:42
6 Q. Who are the investigators? 10:32:47
7 A. The investigators are usually the 10:32:49
8 officers, security. 10:32:51
9 Q. Did you ever work on any PREAs 10:32:56
10 involving Ms. Diamond? 10:33:02
11 A. I did. As far as work, would just 10:33:06
12 be a supportive person for Ms. Diamond, but each 10:33:13
13 investigation that took place, Diamond refused 10:33:17
14 to provide any information on what happened. 10:33:21
15 Q. She refused to provide it to you? 10:33:27
16 A. To me or the investigator. 10:33:30
17 Q. Do you remember how many 10:33:33
18 investigations that you worked on involving Ms. 10:33:36
19 Diamond? 10:33:39
20 A. I want to say it was about maybe 10:33:41
21 two or three, but I do know that there were 10:33:44
22 several more PREAs found than those, that I sat 10:33:47
23 in on. 10:33:53
24 Q. So the other -- so there were 10:33:54
25 others that you were not involved with; is that 10:33:55

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1	what you're saying?	10:33:58
2	A. Yes, sir.	10:33:59
3	Q. Got it.	10:34:01
4	You said Ms. Diamond refused to	10:34:02
5	participate; is that right?	10:34:04
6	A. Yes. She -- her statement and	10:34:06
7	what she provided as well on a witness statement	10:34:07
8	was that she refused to talk about it without	10:34:11
9	being in the presence of her lawyer.	10:34:14
10	Q. And did you respond to that?	10:34:24
11	A. I didn't respond to that, no.	10:34:26
12	Q. Do you know if there was any	10:34:31
13	response to that?	10:34:32
14	A. I don't know if there was a	10:34:38
15	response to that, but the immediate response	10:34:39
16	that was given during that time was that, well,	10:34:43
17	we can't right now. Like we would have to set	10:34:49
18	that up later, because it was during the initial	10:34:55
19	investigation, but I don't know what that	10:34:58
20	response was after the investigation was over.	10:35:01
21	Q. Who did that response come from?	10:35:03
22	A. Mr. Betterson.	10:35:09
23	Q. Did you ever try to arrange for a	10:35:14
24	lawyer to be present for her?	10:35:16
25	A. No, sir.	10:35:20

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1	Q.	Did you inform anyone that she	10:35:20
2		wanted a lawyer?	10:35:22
3	A.	My supervisor knew that because I	10:35:25
4		was a witness that she did state that in front	10:35:30
5		of him.	10:35:34
6	Q.	And again just to be clear, your	10:35:34
7		supervisor, you're referring to Mr. Betterson?	10:35:36
8	A.	Yes, sir.	10:35:44
9	MR. FLEISHER:	Ms. Hope, if we can	10:35:52
10		pull up a document marked DEF 1106.	10:35:54
11	THE TECHNICIAN:	Yes, just one	10:35:59
12		moment.	10:36:00
13	MR. CHALMERS:	Counsel, can you	10:36:03
14		share these as you did the exhibits the other	10:36:05
15		day so that I can be sure to see all pages?	10:36:07
16	MR. FLEISHER:	Yeah, I actually	10:36:10
17		don't know how to do that. Hopefully Ms. Hope	10:36:12
18		can do that.	10:36:15
19	MR. CHALMERS:	Okay. I'll just	10:36:16
20		ask for you to pause just for a moment so that I	10:36:17
21		can get the document before you get started.	10:36:20
22	MR. FLEISHER:	Ms. Hope, are you	10:36:23
23		able to -- the other deposition, they were able	10:36:26
24		to pop it into the chat.	10:36:28
25	THE TECHNICIAN:	Yes, I can put	10:36:35

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1	that in there.	10:36:37
2	MR. FLEISHER: Thank you.	10:36:38
3	Sorry, Ms. Moody, just bear with	10:36:53
4	us for a moment.	10:36:56
5	THE TECHNICIAN: Okay, that should	10:36:57
6	be in the chat for you now.	10:36:58
7	MR. FLEISHER: Mr. Chalmers, can	10:37:00
8	you access that?	10:37:02
9	MR. CHALMERS: I'm trying now,	10:37:04
10	give me just a second.	10:37:05
11	MR. FLEISHER: Sure. Just let us	10:37:06
12	know once you have it. And in the meantime, Ms.	10:37:08
13	Moody, is that showing up on your screen?	10:37:12
14	THE WITNESS: Yes.	10:37:14
15	MR. FLEISHER: So while	10:37:15
16	Mr. Chalmers is looking for it, if you want to	10:37:15
17	take a look at this document, you can let us	10:37:18
18	know as well once you've had a chance to look	10:37:23
19	over it.	10:37:25
20	MR. FLEISHER: Ms. Hope, I'm	10:37:39
21	sorry, we didn't establish this beforehand, but	10:37:40
22	can we mark this, I guess Moody Exhibit 1?	10:37:43
23	THE TECHNICIAN: Yes, absolutely.	10:37:48
24	MR. FLEISHER: Thank you.	10:37:49
25	(Exhibit Moody 1 marked for	10:37:50

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1	identification.)	10:37:54
2	MR. CHALMERS: I do have it now.	10:37:54
3	Thank you, counsel.	10:37:56
4	MR. FLEISHER: Okay.	10:37:57
5	BY MR. FLEISHER:	10:37:58
6	Q. So Ms. Moody, once you've had a	10:37:58
7	chance to look at it, please just let me know.	10:38:01
8	Take your time.	10:38:03
9	MR. CHALMERS: And if we could let	10:38:13
10	the witness know that it's a two-page document	10:38:15
11	in case she wants to see the second page.	10:38:18
12	THE WITNESS: Yes, can I see the	10:38:21
13	second page.	10:38:24
14	MR. FLEISHER: Looks like -- what	10:38:28
15	I'm seeing, it doesn't look like there's	10:38:30
16	anything on the second page.	10:38:32
17	MR. CHALMERS: That's right,	10:38:34
18	that's correct. I was looking at the Bates	10:38:35
19	numbers, not the content.	10:38:38
20	MR. FLEISHER: Yeah, understood.	10:38:40
21	A. Am I giving a response for this?	10:38:43
22	Q. No, I haven't asked a question	10:38:45
23	yet. I just wanted to make sure you had a	10:38:47
24	chance to look at it.	10:38:50
25	A. Okay.	10:38:51

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1 MR. FLEISHER: Actually, Ms. Hope, 10:38:52
2 is it possible to make it bigger? Possible to 10:38:53
3 go even a little bigger? Might just be my poor 10:39:04
4 vision. 10:39:08
5 Okay, that looks good to me. 10:39:09
6 Q. And, Ms. Moody, of course let Ms. 10:39:12
7 Hope know if we need to scroll up or down. 10:39:14
8 Are you familiar with this 10:39:18
9 document that's been marked as Moody Exhibit 1? 10:39:18
10 A. Yes, I am. 10:39:21
11 Q. Can you tell me what it is? 10:39:21
12 A. This is just a summary of each 10:39:24
13 PREA, so this document is completed for each 10:39:29
14 PREA, and it's basically a summary of from start 10:39:31
15 to end. 10:39:36
16 Q. What do you mean from start to 10:39:37
17 end? 10:39:39
18 A. From the start of the PREA 10:39:40
19 initiation to the result of the PREA. 10:39:42
20 Q. Okay. And did you author this 10:39:49
21 particular document? 10:39:51
22 A. I did not. I have very distinct 10:39:53
23 handwriting and this is not my handwriting. 10:39:56
24 MR. FLEISHER: Ms. Hope, can you 10:40:02
25 scroll down. Thank you. 10:40:05

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1	Q.	Ms. Moody, is that your name there	10:40:09
2		above the line that says "SART Investigator"?	10:40:13
3	A.	Yes, it is, that is my name. And	10:40:16
4		that is how I signed every document. It is.	10:40:18
5	Q.	So I just want to make sure I	10:40:23
6		understand. So you signed this but you're	10:40:25
7		saying you didn't write the rest of it; is that	10:40:27
8		what you're saying?	10:40:29
9	A.	No, I didn't sign this either.	10:40:30
10	Q.	Okay, I'm sorry. I'm unclear. I	10:40:35
11		thought you said that's how you -- this is not	10:40:38
12		your signature?	10:40:40
13	A.	When I say every document I	10:40:41
14		signed, I signed it P. Moody but, no, this is	10:40:43
15		not -- I did not sign this document. That is	10:40:47
16		not my handwriting.	10:40:50
17	Q.	So someone else wrote in P. Moody,	10:40:51
18		is that what you're saying?	10:40:54
19	A.	Yes.	10:40:56
20	Q.	Did you ever complete documents	10:41:00
21		like this?	10:41:03
22	A.	I don't recall completing this	10:41:05
23		document but, like I said, I am familiar with	10:41:07
24		this document and making sure that we had	10:41:13
25		documents for our ACA and our PREA audit. I was	10:41:17

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1 in charge of getting those documents together, 10:41:22
2 so I'm very familiar with this document, but I 10:41:24
3 don't recall ever filling it out. Because, 10:41:29
4 again, I was never a SART investigator. That 10:41:31
5 was the job of security, not a GDC counselor. 10:41:34
6 Q. Okay. So where it says "SART 10:41:40
7 Investigator" and has your name above that, 10:41:43
8 you're saying that it's inaccurate; is that 10:41:47
9 right? 10:41:49
10 A. Yes, sir. 10:41:50
11 Q. Okay. 10:41:50
12 Do you know what the purpose of 10:41:51
13 these documents is, these SART investigator -- 10:41:52
14 SART checklists? 10:41:57
15 A. The purpose is so that nothing 10:41:58
16 goes missed, that all the dots are dotted and 10:42:03
17 T's crossed in each investigation. 10:42:07
18 MR. FLEISHER: Okay. Ms. Hope, we 10:42:14
19 can take this document down, thank you. 10:42:17
20 Q. Ms. Moody, did you ever recommend 10:42:34
21 to anyone that Ms. Diamond's housing be changed? 10:42:34
22 A. No, sir. 10:42:35
23 Q. Do you know if Ms. Diamond's 10:42:38
24 housing ever did change during the time you were 10:42:41
25 at Coastal? 10:42:43

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	A.	Her housing never changed.	10:42:45
2	Q.	Did Ms. Diamond ever -- do you	10:42:52
3		know how Ms. Diamond brought her PREA	10:42:56
4		allegations to the attention of the facility?	10:42:59
5	A.	I know we had one a third party,	10:43:09
6		but I'm not sure if she did the PREA allegations	10:43:14
7		on a tablet or using the PREA that's located in	10:43:17
8		the dorm. But I do know some were third party.	10:43:22
9	Q.	Did she ever communicate an	10:43:27
10		allegation directly to you?	10:43:29
11	A.	Yes, in talking about the	10:43:32
12		allegations that she had already reported, but	10:43:35
13		she never initially reported any new PREAs to	10:43:38
14		me, no.	10:43:42
15	Q.	But she talked to you about them?	10:43:42
16	A.	About her PREAs, like, you know I	10:43:44
17		filed a PREA, in that context.	10:43:47
18	Q.	What else did she say about them?	10:43:49
19	A.	I don't recall any specific. It	10:43:54
20		would just be in defense of something. You	10:44:00
21		know, all these PREAs I've got, they should do	10:44:03
22		X, Y and Z; it would just be in defense of	10:44:06
23		whatever point she was trying to make.	10:44:10
24	Q.	And how would you respond?	10:44:13
25	A.	I responded in basically taking	10:44:21

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1 her suggestions as to what could help with this 10:44:23
2 or, okay, well -- but there was never really any 10:44:26
3 suggestions as to what any one person could do. 10:44:34
4 It was always just by circumstance. For an 10:44:38
5 example, there was one where she reported being 10:44:45
6 in a shower and someone put a fan in the room 10:44:50
7 and it blew her shower curtain back. 10:44:55
8 Q. You said a third -- you talked 10:45:03
9 about a third-party PREA; is that right? 10:45:07
10 A. Yes, sir. 10:45:10
11 Q. What do you mean by that? 10:45:11
12 A. Basically we got -- I want to say 10:45:12
13 it was a letter stating that she reported a 10:45:14
14 PREA, and those are considered third parties if 10:45:17
15 it's coming from -- and I want to say it was 10:45:19
16 from Southern Poverty of Law. 10:45:22
17 Q. How did you see that? 10:45:26
18 A. Every PREA, I would basically get 10:45:28
19 an email, you know, with a PREA alert that a new 10:45:31
20 PREA had come in. It didn't come directly to 10:45:35
21 me. It was only forwarded to everyone that was 10:45:38
22 on -- that was in the SART group. 10:45:41
23 Q. Do you know who forwarded that to 10:45:43
24 you? 10:45:46
25 A. Sometimes it would be from the 10:45:47

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	warden, Warden Benton, sometimes it would be	10:45:48
2	from Betterson.	10:45:53
3	Q. Did you ever have any meetings	10:45:57
4	with anyone to talk about those third-party	10:45:59
5	PREAs?	10:46:03
6	A. Yes. We had meetings with Diamond	10:46:03
7	because that's what the investigation would	10:46:08
8	eventually start from, from that initial contact	10:46:11
9	with Diamond about the report.	10:46:16
10	Q. Did you have meetings with anyone	10:46:18
11	else?	10:46:20
12	A. Not anyone outside of the PREA	10:46:21
13	team.	10:46:24
14	Q. And the fact that it was a third-	10:46:27
15	party PREA, as you say, does that mean anything	10:46:33
16	in terms of how you conduct the investigation?	10:46:35
17	A. Not that I am aware of; it	10:46:40
18	wouldn't be conducted any different than PREA	10:46:44
19	from any other offender.	10:46:47
20	Q. And did you work on that	10:46:50
21	third-party PREA investigation?	10:46:52
22	A. I'm not sure what you mean about	10:46:55
23	work on.	10:46:56
24	Q. Sorry. Well, you said sometimes	10:46:59
25	you were involved in the investigation as a, I	10:47:01

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1	forget the word you used, a representative. I	10:47:05
2	don't think that was the word. I don't remember	10:47:09
3	the word.	10:47:10
4	A. Yes. And like I said, yes, I was	10:47:11
5	involved. I was during -- I was active in the	10:47:13
6	investigation as her support when the	10:47:19
7	investigation happened. When she talked with	10:47:20
8	Mr. Betterson about the allegations from the	10:47:23
9	third party, she basically responded in the same	10:47:27
10	way, I refuse to disclose anything without being	10:47:31
11	in the presence of my lawyer.	10:47:33
12	Q. So you were there when she spoke	10:47:35
13	to Mr. Betterson?	10:47:38
14	A. Um-hum.	10:47:40
15	Q. Was anyone else there?	10:47:40
16	A. No.	10:47:42
17	Q. When you say you're there as a	10:47:42
18	support, what does that mean?	10:47:45
19	A. I cannot recall the name of that	10:47:46
20	position, but that's basically if -- and it's	10:47:49
21	usually done upon request of the offender. Like	10:47:54
22	an emotional support. So you have to think that	10:48:01
23	these offenders are going through traumatic	10:48:03
24	experiences and it's just there as a support for	10:48:07
25	the offender.	10:48:10

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1	Q.	Did you ever do that for any other	10:48:10
2		offenders?	10:48:13
3	A.	Yes.	10:48:14
4	Q.	Do you speak in that role?	10:48:14
5	A.	Not necessarily. I may be there	10:48:20
6		to calm down any type of emotions that may	10:48:22
7		arrive but, no, my general response is to not	10:48:27
8		speak because I wasn't a witness to any of the	10:48:31
9		allegations.	10:48:34
10	Q.	So the support is just being	10:48:36
11		there, being a physical presence; is that what	10:48:39
12		it is?	10:48:42
13	A.	Yes, sir.	10:48:42
14	Q.	Did you say you last saw Ms.	10:48:47
15		Diamond around the time you left in May of 2021?	10:48:50
16	A.	Yes, sir.	10:48:53
17	Q.	How would you describe her	10:48:55
18		emotional state at that point?	10:48:58
19	A.	At that stage -- I mean, at that	10:49:01
20		time it was more so in passing. She wasn't	10:49:04
21		distraught or anything.	10:49:09
22	Q.	Were you ever aware of Ms. Diamond	10:49:14
23		being suicidal?	10:49:17
24	A.	I had reports of Diamond, and just	10:49:23
25		what I read in certain reports, but Diamond has	10:49:29

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Conducted on February 25, 2022

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1	never expressed any suicidal ideology to me.	10:49:33
2	Q. And you left, again, in May 2021,	10:49:40
3	correct?	10:49:44
4	A. Yes.	10:49:44
5	Q. Left Coastal?	10:49:45
6	A. Yes.	10:49:47
7	Q. Why did you leave?	10:49:48
8	A. I had got new employment.	10:49:49
9	MR. FLEISHER: I think I may be	10:49:58
10	very close to done. If we can take just a quick	10:50:00
11	five-minute break, I want to look over my notes	10:50:03
12	and then I think we'll be close. Mr. Chalmers	10:50:07
13	may have some questions but hopefully, Ms.	10:50:09
14	Moody, we can get you out of here relatively	10:50:12
15	soon.	10:50:14
16	THE WITNESS: Okay.	10:50:14
17	MR. FLEISHER: So, if that's okay	10:50:15
18	with all, 10:55 we can come back.	10:50:16
19	MR. CHALMERS: That's fine. Ms.	10:50:19
20	Moody, just for planning purposes, I will have	10:50:21
21	some questions, probably no more than half an	10:50:24
22	hour, in case you need to take a break.	10:50:27
23	THE WITNESS: Okay.	10:50:29
24	THE VIDEOGRAPHER: With that, the	10:50:30
25	time is 10:50 a.m. We are off the record. I am	10:50:32

Transcript of Porshe Moody
Conducted on February 25, 2022

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1	stopping the recording now.	10:50:47
2	(Recess taken.)	10:50:49
3	THE VIDEOGRAPHER: The time is	10:55:45
4	10:55 a.m. We are back on the record.	10:55:50
5	MR. FLEISHER: Ms. Moody, I do not	10:55:54
6	have any more questions for you at this time.	10:55:57
7	So, I appreciate your time. I might have a few	10:55:59
8	after Mr. Chalmers goes, but I'm going to turn	10:56:02
9	it over to him. Thank you.	10:56:05
10	THE WITNESS: Okay.	10:56:06
11	- - -	10:56:07
12	EXAMINATION BY MR. CHALMERS:	10:56:07
13	Q. Good morning, Ms. Moody.	10:56:08
14	A. Good morning.	10:56:10
15	Q. My name is Roger Chalmers and I	10:56:11
16	represent the defendants in the case that Ashley	10:56:13
17	Diamond has filed.	10:56:16
18	Thank you for appearing today. I	10:56:20
19	have a few questions. As I said, I think it	10:56:22
20	will be 20 to 30 minutes, but probably not much	10:56:26
21	more than that.	10:56:29
22	I have a couple screens up and I'm	10:56:30
23	looking primarily at the documents on the	10:56:33
24	screen, so I'm not looking directly at you,	10:56:38
25	okay?	10:56:41

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1	A.	Okay.	10:56:41
2	Q.	I know that's a little	10:56:42
3		disconcerting.	10:56:43
4		You are at your current place of	10:56:46
5		employment today; is that correct?	10:56:48
6	A.	Yes, sir.	10:56:50
7	Q.	And that -- were you served with a	10:56:53
8		subpoena for today's deposition?	10:57:07
9	A.	Yes, sir.	10:57:09
10	Q.	Where were you served?	10:57:10
11	A.	At my brother's house.	10:57:17
12	Q.	Was that done by a process server?	10:57:19
13	A.	I'm not sure, but I lived in that	10:57:24
14		residence when I first worked at Coastal State	10:57:28
15		Prison, so I wasn't -- he was served, I guess.	10:57:32
16		I don't know.	10:57:36
17	Q.	Okay, I understand.	10:57:37
18	A.	Okay.	10:57:40
19	Q.	After you were served with the	10:57:41
20		subpoena, did you have any conversations with	10:57:42
21		anyone about the subpoena?	10:57:44
22	A.	I haven't.	10:57:46
23	Q.	Have you had any conversations	10:57:48
24		with Mr. Fleisher, Aaron Fleisher, who is taking	10:57:49
25		your deposition today before today's deposition?	10:57:55

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1	A.	No, sir.	10:57:57
2	Q.	Have you spoken with anybody from	10:57:57
3		his firm, the Southern Poverty Law Center,	10:57:59
4		before today's deposition?	10:58:02
5	A.	Yes.	10:58:04
6	Q.	Who is that?	10:58:04
7	A.	I have her name in an email, and I	10:58:08
8		can't think --	10:58:15
9	Q.	Did you exchange emails with this	10:58:18
10		person?	10:58:20
11	A.	I was sent an email with her	10:58:22
12		information, just to get a clarification as to	10:58:25
13		what this was about. Like I said, I haven't,	10:58:29
14		you know, heard anything about anything since I	10:58:34
15		left Coastal, so this was definitely a shock	10:58:38
16		came out of the blue.	10:58:42
17	Q.	Okay. And did you have any	10:58:43
18		conversations with this person or did you	10:58:45
19		exchange email of any substance regarding Ms.	10:58:48
20		Diamond or her lawsuit?	10:58:51
21	A.	You mean the person at Southern?	10:58:55
22	Q.	Yes.	10:58:58
23	A.	Yes.	10:58:59
24	Q.	What was the nature of those	10:59:00
25		conversations or emails?	10:59:02

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1	A.	Well, it was an email -- I don't	10:59:04
2		know what to call it, not a disposition, but	10:59:11
3		just to go over and just certain questions that	10:59:14
4		would be asked.	10:59:19
5	Q.	Do you have that email?	10:59:25
6	A.	I do.	10:59:28
7	Q.	Could I ask that you save it?	10:59:29
8	A.	Okay.	10:59:31
9	Q.	Thank you.	10:59:32
10		Did you have any phone	10:59:36
11		conversations or in-person conversations with	10:59:37
12		anybody about this deposition?	10:59:39
13	A.	Besides the lady from Southern?	10:59:42
14	Q.	Yes.	10:59:48
15	A.	No.	10:59:48
16	Q.	And going back to the lady from	10:59:49
17		Southern Poverty Law Center, did you have a	10:59:52
18		telephone conversation with that person?	10:59:54
19	A.	Yes, we had a telephone	10:59:59
20		conversation.	11:00:00
21	Q.	When was that?	11:00:01
22	A.	I think it was either Monday or	11:00:04
23		Tuesday.	11:00:05
24	Q.	Okay. And what did you discuss?	11:00:06
25	A.	She basically just asked, you	11:00:12

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1	know, pretty -- some of the same questions that	11:00:15
2	I kind of answered today, what was my role	11:00:18
3	there. We talked about the group. She asked if	11:00:22
4	Diamond was, you know, credible, or did I deem	11:00:36
5	Diamond credible in some of the allegations.	11:00:44
6	And I want to say that's about everything.	11:00:47
7	Q. What did you answer when she asked	11:00:49
8	did you deem Diamond credible?	11:00:53
9	A. I told her that there were certain	11:01:00
10	things that Diamond would report that wasn't on	11:01:02
11	a report or certain things that Diamond would	11:01:05
12	leave out that wasn't in the report; so, I	11:01:09
13	couldn't 100 percent believe everything that	11:01:14
14	Diamond reported.	11:01:16
15	Q. Did you have any other	11:01:20
16	conversations before the deposition, other than	11:01:24
17	the one you've just described to me?	11:01:26
18	A. The only other thing I just feel	11:01:33
19	maybe that needs to be stated, it was a question	11:01:36
20	of I guess her safety in where she was located.	11:01:42
21	She, Diamond reported being around sexual	11:01:51
22	predators and, you know, other inmates with	11:01:56
23	really extreme charges, if you say, but I just	11:01:59
24	wanted to specify that Diamond was located in an	11:02:03
25	honor dorm. So despite the past records of the	11:02:06

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1 offenders she was housed with, they were 11:02:12
2 considered good offenders with no, you know, 11:02:14
3 recent DRs or no trouble at all since their 11:02:18
4 incarceration. 11:02:22

5 Q. Okay. And did you share that 11:02:23
6 information with the person that you talked 11:02:25
7 with? 11:02:27

8 A. Yes, sir. 11:02:27

9 Q. And that is your belief, that Ms. 11:02:32
10 Diamond was placed at Coastal State Prison in a 11:02:34
11 dormitory where she was with relatively safe 11:02:37
12 offenders? 11:02:44

13 A. Yes, sir. 11:02:45

14 Q. All right. Other than what you've 11:02:51
15 described to me about conversations leading up 11:02:53
16 to the deposition, have you talked about Ms. 11:02:55
17 Diamond or her lawsuit or the subpoena that you 11:02:58
18 got with anyone before today's deposition? 11:03:03

19 A. No. 11:03:06

20 Q. I want to explain something to you 11:03:14
21 about depositions since you don't have counsel 11:03:16
22 today. 11:03:19

23 When we're finished, the court 11:03:20
24 reporter, Ms. Bendish, is going to put the 11:03:22
25 transcript on paper and there will also be a 11:03:26

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1	video of this deposition.	11:03:29
2	A. Okay.	11:03:31
3	Q. You have the right to read and	11:03:31
4	sign the transcript if you'd like to do that;	11:03:34
5	and that means that before it's put in a final	11:03:37
6	form, you can look at a copy of the transcript,	11:03:41
7	make sure it's accurate, note any corrections	11:03:44
8	and then sign if there are any corrections	11:03:48
9	needed.	11:03:50
10	And so you can waive that right if	11:03:51
11	you don't want to do that, if you want to just	11:03:54
12	be done with it, or you can exercise that right.	11:03:57
13	Before we finish today, I'd like you just to let	11:04:00
14	the court reporter know what you would like to	11:04:04
15	do.	11:04:07
16	A. Okay. I would like to -- I'm	11:04:08
17	sorry.	11:04:09
18	Q. You would like to read and sign?	11:04:09
19	A. Yes, sir.	11:04:11
20	Q. Okay. The second thing I wanted	11:04:12
21	to tell you is that I will be filing a copy of	11:04:13
22	this transcript with the Court, and because	11:04:16
23	you're not represented by counsel I'd like to	11:04:19
24	know, is there anything in the transcript that	11:04:21
25	you have concerns about being made public?	11:04:24

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1	The information related to Ms.	11:04:27
2	Diamond is part of the case, but there's some	11:04:30
3	other information such as where you work, and if	11:04:32
4	there's any information you would not want to be	11:04:34
5	made public, the lawyers can talk about	11:04:37
6	redacting that information.	11:04:39
7	Is there any information that	11:04:41
8	we've discussed that you think you would prefer	11:04:43
9	not to have made public?	11:04:44
10	A. I definitely don't want anything	11:04:46
11	where I work or anything like that made public.	11:04:49
12	Q. Okay.	11:04:53
13	A. Just whatever is, you know,	11:04:54
14	discussed with Ms. Diamond, that's it, but	11:04:58
15	nothing personally.	11:05:03
16	Q. Okay. So I'll talk with the	11:05:04
17	lawyers before the transcript is filed about the	11:05:07
18	names. I don't believe the current place of	11:05:13
19	your employment has been mentioned at all.	11:05:15
20	A. Okay.	11:05:20
21	Q. But we'll discuss that.	11:05:20
22	A. Okay.	11:05:22
23	Q. So let me go on then with the	11:05:22
24	questions that I had.	11:05:25
25	You have not interacted with	11:05:26

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1	Ashley Diamond since May of 2021 --	11:05:34
2	A. No, sir.	11:05:37
3	Q. -- correct? But from the time	11:05:38
4	period of roughly June of 2020 until May of	11:05:42
5	2021, is it correct that you interacted with	11:05:46
6	Ashley Diamond roughly once a week for your	11:05:49
7	general counseling sessions?	11:05:51
8	A. Yes, sir.	11:05:53
9	Q. And then, in addition to that	11:05:54
10	once-a-week general counseling session, you also	11:05:56
11	had the transgender or the Alternative Lifestyle	11:05:58
12	Group meetings that you discussed?	11:06:02
13	A. So, the meetings were my once-a-	11:06:03
14	week meetings with Ms. Diamond. I did not want	11:06:10
15	to give -- like, to show like favoritism. Like	11:06:14
16	I said, every other offender would only meet	11:06:21
17	once every three months. So I did not -- I	11:06:25
18	tried to make Diamond as inclusive as the other	11:06:28
19	offenders as possible.	11:06:31
20	So, me creating that once-a-week	11:06:32
21	group was me meeting with Diamond once a week	11:06:35
22	just to get reports. Even though, you know,	11:06:37
23	there were times like if she needed to speak	11:06:41
24	with me outside of the group during that week,	11:06:44
25	you know, to make any reports or anything like	11:06:47

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1 that, she had that option. But most of the time 11:06:48
2 that we met it was in a group, in the 11:06:51
3 transgender group format. 11:06:53
4 Q. Oh, I see. So you had mentioned 11:06:56
5 that -- well, just so I understand, you met with 11:07:00
6 Ms. Diamond on a once-a-week basis, but 11:07:07
7 generally that once-a-week meeting was in the 11:07:09
8 form of the Alternative Lifestyle Group meeting? 11:07:11
9 A. Yes, sir. 11:07:14
10 Q. I got it. 11:07:16
11 And did you also have the ability 11:07:25
12 to meet with Ms. Diamond one on one? 11:07:26
13 A. Yes, sir, I did. And that wasn't 11:07:29
14 every week. Sometimes I would just pop up at 11:07:32
15 her dorm, just to check in. So, yeah, I could 11:07:35
16 see her whenever I wanted, really, but I tried 11:07:41
17 to keep it to that once a week during the weekly 11:07:44
18 meetings with the group. 11:07:48
19 Q. Where was that weekly meeting 11:07:50
20 held? 11:07:55
21 A. It was held in the counseling 11:07:55
22 department in a room, in the big conference -- 11:07:59
23 basically the same room that we would have 11:08:02
24 orientation for new arrivals. 11:08:05
25 Q. And if you met separately with Ms. 11:08:09

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1	Diamond --	11:08:11
2	A. It would be in my office. It	11:08:13
3	would be in my office, I'm sorry.	11:08:15
4	Q. Okay. And was that in a	11:08:16
5	counseling building of some kind?	11:08:19
6	A. Yes, sir.	11:08:21
7	Q. It was not in the dormitory where	11:08:22
8	Ms. Diamond was assigned?	11:08:24
9	A. Sometimes I would meet her down	11:08:26
10	there just to, like I said, to check in to do	11:08:28
11	random pop-ups, but if she needed to discuss	11:08:30
12	anything, we would arrange to meet in my office.	11:08:35
13	Q. You mentioned that as a general	11:08:39
14	counselor you were not part of the mental health	11:08:41
15	team, correct?	11:08:47
16	A. Yes, sir. That's correct.	11:08:48
17	Q. And I think you used the words you	11:08:49
18	had a very good relationship with the mental	11:08:51
19	health team?	11:08:55
20	A. Yes, sir.	11:08:55
21	Q. If Ms. Diamond relayed information	11:08:56
22	to you, would you be able to, if you felt it was	11:08:58
23	necessary, relay that information to her mental	11:09:02
24	health team, or provide --	11:09:05
25	A. Yes, sir. Yes, sir. And that's	11:09:07

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1 what I mean by we had a really good 11:09:09
2 relationship, we kept that communication open. 11:09:12
3 So even when there would be some harm X, I would 11:09:14
4 know from her mental health counselor; we would 11:09:18
5 keep in contact. 11:09:21
6 I think there was a question 11:09:22
7 earlier if she ever disclosed, you know, being 11:09:23
8 suicidal to me; no, it wasn't to me, but I do 11:09:28
9 know that she had voiced that to her mental 11:09:32
10 health counselor. 11:09:35
11 Q. You were asked, or you talked 11:09:38
12 about the briefing that occurred before Ms. 11:09:40
13 Diamond arrived at Coastal State Prison. 11:09:44
14 A. Yes, sir. 11:09:47
15 Q. Who organized that briefing? 11:09:48
16 A. I want to say it was one of the 11:09:51
17 monthly counselor meetings that we had. 11:09:53
18 Q. Okay. And to the best of your 11:09:56
19 recollection Deputy Warden Betterson attended 11:09:59
20 that briefing? 11:10:02
21 A. Yes, sir. 11:10:04
22 Q. You described the backdrop or the 11:10:06
23 reason for the meeting is that Diamond was a 11:10:11
24 careful situation, I think those are the words 11:10:14
25 you used? 11:10:16

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1	A.	Yes, sir. Let me specify.	11:10:18
2		The meeting wasn't organized for	11:10:21
3		Diamond; it just came out as one of the	11:10:24
4		briefings that we would have on, you know, an	11:10:28
5		inmate to refer to this inmate as certain	11:10:31
6		pronouns, of that nature. But her being	11:10:34
7		specified to my caseload, that was just a	11:10:39
8		conversation between me and Betterson, that he	11:10:42
9		trusted me with her being on my caseload.	11:10:45
10	Q.	Okay. You mentioned that at the	11:10:48
11		briefing one of the main concerns was the safety	11:11:07
12		and a safe location for Ms. Diamond?	11:11:13
13	A.	Yes, sir.	11:11:19
14	Q.	Do you believe that at Coastal	11:11:20
15		State Prison efforts were taken to make sure	11:11:23
16		Diamond remained safe in her housing?	11:11:25
17	A.	Yes, sir.	11:11:29
18		MR. FLEISHER: Objection.	11:11:30
19	Q.	That was one of the topics of the	11:11:33
20		briefing before Diamond arrived, correct?	11:11:35
21	A.	Yes, sir.	11:11:38
22	Q.	Then do you believe, from what you	11:11:39
23		were involved in at Coastal, that efforts were	11:11:42
24		being made to keep Diamond safe at Coastal for	11:11:45
25		all the time she was housed there?	11:11:48

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1	A.	Yes, sir.	11:11:51
2		MR. FLEISHER: Objection.	11:11:52
3	Q.	You were asked about use of	11:12:06
4		pronouns, and I believe you indicated that	11:12:09
5		another topic that was discussed at the briefing	11:12:12
6		was use of pronouns for transgender offenders?	11:12:15
7	A.	Yes, sir.	11:12:19
8	Q.	And you said that you'd be lying	11:12:20
9		if you said that everybody stuck to using proper	11:12:26
10		pronouns; were those your words?	11:12:28
11	A.	Yes, sir.	11:12:30
12	Q.	However, you also said you weren't	11:12:31
13		aware that anybody used incorrect pronouns other	11:12:33
14		than out of habit; is that right?	11:12:40
15	A.	Yes, sir.	11:12:43
16	Q.	Do you believe that, or did you	11:12:44
17		witness anyone at Coastal State Prison using	11:12:45
18		incorrect pronouns for Ashley Diamond out of	11:12:48
19		disrespect or to be harmful?	11:12:51
20	A.	I didn't personally witness	11:12:56
21		anyone, but I did get reports that people were	11:12:59
22		doing it in an inappropriate manner.	11:13:04
23	Q.	Do you believe that the	11:13:09
24		supervisory staff and supervisors were	11:13:11
25		attempting to use correct pronouns for Ashley	11:13:14

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1	Diamond?	11:13:19
2	A. Yes, sir.	11:13:19
3	Q. You have indicated that Deputy	11:13:30
4	Warden Betterson asked you to meet with Ashley	11:13:33
5	Diamond two times a week?	11:13:36
6	A. Once a week.	11:13:38
7	Q. Once a week?	11:13:39
8	A. Yes, sir.	11:13:40
9	Q. And that Warden Benton also made	11:13:41
10	this request?	11:13:44
11	A. Yes, sir.	11:13:46
12	Q. Was that request made early in the	11:13:47
13	time that you began to interact or counsel	11:13:49
14	Diamond?	11:13:54
15	A. Yes, sir.	11:13:55
16	Q. Was that once per week -- I'm	11:14:00
17	sorry if you've explained this -- was that once-	11:14:05
18	per-week frequency more frequent than you would	11:14:08
19	meet with other offenders on your caseload?	11:14:13
20	A. Yes, sir; it was.	11:14:16
21	Q. You have said that you created	11:14:50
22	what you called the Transgender Group or the	11:14:52
23	Alternative Lifestyle Group during your time at	11:14:55
24	Coastal?	11:14:58
25	A. Yes, sir.	11:14:58

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1 Q. Did you have to get approval to 11:14:59
2 create that group? 11:15:01

3 A. I definitely ran it by my 11:15:04
4 supervisor. And like I said, they were in 11:15:06
5 support of it, of creating that group. So much 11:15:09
6 so that the warden met with us on the first day 11:15:13
7 and he made it, you know, an objective to let 11:15:17
8 them know who he was and, you know, just to open 11:15:21
9 up that line of communication in case of 11:15:26
10 anything that they needed or had to report. 11:15:28

11 Q. And when you say you ran it by 11:15:32
12 your supervisor, do you mean that you -- when 11:15:35
13 you had the -- 11:15:38

14 A. Got it approved. 11:15:41

15 Q. Say it again. 11:15:42

16 A. Got it approved, yes, sir. 11:15:44

17 Q. Okay. I was thinking of something 11:15:45
18 a bit different. 11:15:47

19 When you say you ran it by your 11:15:48
20 supervisor, were you referring to Deputy Warden 11:15:50
21 Betterson? 11:15:53

22 A. Yes, sir. 11:15:54

23 Q. So you approached Deputy Warden 11:15:55
24 Betterson with your idea that you'd like to 11:15:58
25 create the alternative lifestyle or transgender 11:16:01

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1	group and he approved that, or he was in favor	11:16:03
2	of that?	11:16:06
3	A. Yes, sir, he was.	11:16:07
4	Q. And then in addition to that,	11:16:08
5	Warden Benton you indicate also was in favor of	11:16:10
6	it?	11:16:13
7	A. Yes, sir.	11:16:14
8	Q. And Warden Benton attended the	11:16:15
9	first meeting or the first meetings to make sure	11:16:17
10	that offenders in the group knew who he was?	11:16:20
11	A. Yes, sir.	11:16:23
12	Q. And knew how to report problems?	11:16:24
13	A. Yes, sir.	11:16:26
14	Q. And that would include knowing how	11:16:27
15	to deal with or report a PREA?	11:16:28
16	A. Yes, sir.	11:16:33
17	Q. Would you say that in that regard	11:16:42
18	Warden Benton was trying to show support for the	11:16:44
19	transgender offenders?	11:16:47
20	MR. FLEISHER: Objection.	11:16:50
21	A. Yes, sir.	11:16:51
22	Q. Would you say the same about	11:16:52
23	Deputy Warden Betterson in his approval of that	11:16:55
24	group, that he was trying to allow you to	11:16:57
25	support the transgender offenders, including Ms.	11:16:58

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1	Diamond?	11:17:02
2	MR. FLEISHER: Objection.	11:17:02
3	A. Yes, sir.	11:17:04
4	Q. When you were asked earlier about	11:17:18
5	undergarments and when from time to time that	11:17:22
6	issue would come up, you used the phrase "there	11:17:25
7	were always issues with timeliness." I'm using	11:17:28
8	quotes around those. What did you mean by that?	11:17:34
9	A. So I could -- there was one	11:17:43
10	instance where I put the report in and it was	11:17:45
11	just a lot of turn-around of who did, who put	11:17:47
12	the order in and what time they put the order	11:17:50
13	in, but never a denial of it, but just, it was	11:17:54
14	just moved around a lot, which took time for it	11:17:58
15	to actually -- from me initially ordering it to	11:18:02
16	it getting to the facility.	11:18:07
17	Q. And do you know if anyone at the	11:18:09
18	facility, meaning Coastal, intentionally slowed	11:18:12
19	down that process?	11:18:16
20	A. I don't think it was intentional.	11:18:20
21	It could -- and I'm just throwing suggestions --	11:18:24
22	it could have been that it was a new way of	11:18:28
23	ordering. They had to figure out where to get	11:18:30
24	it from being that it was just a new order of	11:18:34
25	business for that facility.	11:18:39

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1	Q.	Did the undergarments come from a	11:18:43
2		room somewhere at Coastal, or did they come from	11:18:48
3		somewhere off-site?	11:18:51
4	A.	It was definitely somewhere	11:18:53
5		off-site.	11:18:54
6	Q.	Do you know where or what the	11:18:55
7		process was for collecting them or getting them?	11:18:57
8	A.	I don't.	11:18:59
9	Q.	Okay.	11:19:00
10		You were asked about the weekly	11:19:11
11		report that you did concerning Ashley Diamond.	11:19:12
12	A.	Um-hum.	11:19:17
13	Q.	And you indicated that you would	11:19:18
14		sometimes get a response to your report and	11:19:21
15		sometimes you would not. So I wanted to ask	11:19:23
16		about that.	11:19:26
17		When you reported an issue or a	11:19:27
18		problem you thought needed to be addressed, for	11:19:29
19		those kinds of reports did you get a response?	11:19:33
20	A.	Yes, sir.	11:19:36
21	Q.	You mentioned one, for example,	11:19:37
22		that Ms. Diamond said there was a concern she	11:19:38
23		had about a lock or a locking mechanism.	11:19:41
24	A.	Yes, sir.	11:19:44
25	Q.	And you reported that in one of	11:19:45

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1	your weekly reports?	11:19:47
2	A. Yes, sir.	11:19:48
3	Q. And you got a response to that?	11:19:49
4	A. Yes, sir.	11:19:51
5	Q. And others of your reports were	11:19:52
6	simply indicating what occurred that week	11:19:54
7	related to Diamond, correct?	11:19:57
8	A. Yes, sir.	11:19:59
9	Q. But they were not necessarily	11:20:00
10	items that you would expect to get a response	11:20:02
11	to?	11:20:04
12	A. Yes, sir.	11:20:05
13	Q. And were those the ones where you	11:20:06
14	did not get a response?	11:20:11
15	A. Yes, sir.	11:20:14
16	Q. Do you know if, to your	11:20:18
17	knowledge -- strike that.	11:20:22
18	Did Ms. Diamond ever complain to	11:20:25
19	you about not receiving hormone treatments at	11:20:28
20	Coastal State Prison?	11:20:33
21	A. She complained about not getting	11:20:35
22	them on a certain day or by, you know, a certain	11:20:38
23	time that, I don't know if they were scheduled	11:20:43
24	or in her scheduling but, yeah, she did complain	11:20:47
25	about it took them a day or they didn't call me	11:20:50

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1	out until such and such to get it.	11:20:54
2	Q. Were you aware during the time	11:20:57
3	that you were providing general counseling to	11:20:58
4	Ms. Diamond that she was on hormone therapy?	11:21:01
5	A. Yes, I was aware.	11:21:05
6	Q. And to your knowledge did she	11:21:06
7	receive that hormone therapy consistently?	11:21:08
8	A. Yes, sir.	11:21:12
9	Q. I wanted to ask you about the	11:21:18
10	exhibit that was put up earlier. I think it was	11:21:20
11	marked as Exhibit 1.	11:21:23
12	MR. CHALMERS: Could we bring that	11:21:26
13	up, please.	11:21:28
14	THE TECHNICIAN: Yes. Just one	11:21:29
15	moment.	11:21:30
16	MR. CHALMERS: Thank you.	11:21:31
17	Q. Ms. Moody, can you see the	11:21:58
18	document? We have just a part of it up on the	11:22:00
19	screen here?	11:22:02
20	A. Yes, sir, I see that.	11:22:03
21	Q. Before I direct you to that, let	11:22:04
22	me just ask generally. Was Deputy Warden	11:22:06
23	Betterson, whose name appears down at the bottom	11:22:17
24	of this document, was he involved in the PREA	11:22:20
25	process, as far as you know?	11:22:26

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1	A.	Yes, sir.	11:22:29
2	Q.	And I believe you indicated you	11:22:33
3		didn't write any of the information on this	11:22:36
4		Exhibit 1; is that correct?	11:22:40
5	A.	That's correct.	11:22:42
6	Q.	Do you know who did?	11:22:44
7	A.	I don't.	11:22:46
8	Q.	Have you seen this document before	11:22:47
9		today?	11:22:50
10	A.	I've seen the document.	11:22:51
11	Q.	(Indiscernible) my question.	11:22:56
12		You, I believe I understand you to	11:22:58
13		have said you recognize this form, a sexual	11:23:01
14		allegation response checklist; is that right?	11:23:08
15	A.	Yes.	11:23:11
16	Q.	But this particular form,	11:23:11
17		completed with the information that's on it, all	11:23:12
18		the handwriting, had you seen it before today?	11:23:14
19	A.	I don't recall if I've seen it. I	11:23:17
20		just know that's not my handwriting.	11:23:20
21	Q.	Okay. Do you know anything at	11:23:23
22		all, looking at it, about the content of what is	11:23:24
23		indicated on this form?	11:23:29
24	A.	I cannot say I recall the	11:23:37
25		incident.	11:23:41

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1	Q.	There are dates that appear on the	11:23:42
2		form, July 7, 2020 it appears.	11:23:44
3	A.	Yes.	11:23:48
4	Q.	And then August 1, 2020. Do you	11:23:48
5		see those dates?	11:23:51
6	A.	I do.	11:23:52
7	Q.	Do you have any idea what those	11:23:53
8		refer -- I'm not asking you to speculate, but	11:23:56
9		I'm asking do you know what those refer to?	11:23:58
10	A.	I'm sorry, I'm not sure exactly	11:24:03
11		what you're asking.	11:24:05
12	Q.	That's fine.	11:24:06
13		Do you know -- looking at what's	11:24:07
14		written on this form, does it help you recall	11:24:11
15		any information at all about the PREA	11:24:15
16		allegations --	11:24:17
17	A.	It doesn't. I just know the	11:24:18
18		process, like as this form reads out, but I	11:24:20
19		don't recall exactly what incident happened on	11:24:26
20		that date.	11:24:28
21	Q.	Okay. And then you don't know	11:24:29
22		about any occurrences or events or	11:24:32
23		investigations or anything that may have	11:24:36
24		occurred on July 7, 2020 or June 18, 2020 or	11:24:38
25		August 1, 2020, the dates that appear on here?	11:24:42

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1	A.	I do not. That's how many PREAs	11:24:46
2		it has been.	11:24:49
3	Q.	Okay. Do you know Deputy Warden	11:24:51
4		Betterson, whether he, in your experience at	11:25:03
5		Coastal, whether he addressed PREAs seriously?	11:25:05
6	A.	I don't know.	11:25:10
7		MR. FLEISHER: Objection.	11:25:10
8	Q.	Do you have any reason in your	11:25:13
9		experience to believe that he did not address	11:25:15
10		the PREA process seriously?	11:25:18
11		MR. FLEISHER: Objection.	11:25:24
12	A.	In hindsight, of course it's	11:25:29
13		always 2020, I can see where there are some	11:25:33
14		things that should have been done in response,	11:25:36
15		but at the time, I'm not sure.	11:25:41
16	Q.	Okay. Trying to get my document	11:25:56
17		mouse to work here.	11:26:00
18		Do you have any information or	11:26:04
19		knowledge of Deputy Warden Betterson ever not	11:26:06
20		investigating a PREA allegation that was made?	11:26:12
21	A.	No, sir. As far as I know from my	11:26:15
22		knowledge, he investigated every PREA.	11:26:17
23	Q.	Okay. You mentioned that one of	11:26:19
24		your roles was for a PREA report you would serve	11:26:24
25		as a support, a representative in a PREA	11:26:35

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1	investigation meeting; is that correct?	11:26:39
2	A. Yes, sir.	11:26:41
3	Q. And you were a support or a	11:26:42
4	representative for the offender who was making	11:26:44
5	the PREA allegation?	11:26:48
6	A. Yes, sir.	11:26:49
7	Q. And you served in that capacity	11:26:50
8	for Ashley Diamond?	11:26:51
9	A. Yes, sir.	11:26:52
10	Q. And you mentioned that you met	11:26:53
11	with Warden Betterson at least on one occasion	11:26:56
12	with Ashley Diamond in that role?	11:26:59
13	A. Yes, sir.	11:27:02
14	Q. And in your experience did Warden	11:27:04
15	Betterson allow for that kind of meeting to be	11:27:07
16	scheduled where an offender could have a support	11:27:11
17	representative like you present to discuss a	11:27:14
18	PREA allegation?	11:27:16
19	A. Yes, sir. I was there for other	11:27:18
20	offenders as well.	11:27:20
21	MR. CHALMERS: If you can give me	11:27:38
22	just two minutes, I'm going to look through my	11:27:40
23	notes and see if I have anything else. I may be	11:27:43
24	finished.	11:27:45
25	THE WITNESS: Okay.	11:27:47

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1	MR. FLEISHER: Are we staying on	11:27:50
2	the record?	11:27:51
3	MR. CHALMERS: Yes, if we could	11:27:51
4	stay on the record just for a moment.	11:27:54
5	(Pause in proceedings.)	11:28:01
6	Q. I did have one other question, Ms.	11:28:59
7	Moody.	11:29:02
8	You had mentioned that one issue	11:29:03
9	that Ms. Diamond brought to your attention was,	11:29:08
10	I believe I wrote this, cameras watching every	11:29:13
11	move.	11:29:17
12	A. Yes.	11:29:22
13	Q. At the facility. What do you	11:29:22
14	recall about what she told you about that?	11:29:25
15	A. With that incident, there were	11:29:31
16	concerns with her moving to different locations.	11:29:33
17	Like I said, she would have weekly meetings with	11:29:39
18	mental health, with me, so there were constant	11:29:43
19	movements for her and there were reports that	11:29:47
20	Diamond was transporting drugs around the	11:29:51
21	facility, and so they implemented cameras being	11:29:58
22	placed on her when she moved.	11:30:03
23	So, she would have to be moved	11:30:07
24	with an officer. So officers had to have a	11:30:10
25	camera on them when they moved Ms. Diamond. And	11:30:14

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1 she reported that she, you know, just felt like 11:30:20
2 she was at a circus or, you know, was an animal 11:30:23
3 at a circus that she was constantly watched 11:30:27
4 everywhere she went. 11:30:31

5 Q. And you indicated that you 11:30:33
6 reported that concern that she had to someone? 11:30:35

7 A. I am not sure if I reported her 11:30:39
8 concerns of the camera being on her. 11:30:43

9 Q. Okay. Do you recall any 11:30:48
10 discussions with anyone about the camera's use, 11:30:50
11 as you just described it? 11:30:55

12 A. I mean, I asked about it and 11:30:56
13 that's what I was told from security, that they 11:30:58
14 did have to wear a camera when they transported 11:31:02
15 her. I didn't hear that directly from my 11:31:07
16 supervisor or the warden, but in response to 11:31:09
17 having a camera on her, I did inquire with a 11:31:14
18 security guard. 11:31:20

19 Q. Okay. Back to the weekly report 11:31:21
20 that you would do on Ashley Diamond, do you know 11:31:24
21 why Warden Benton asked for that weekly report? 11:31:28

22 A. Only to my own speculation, that 11:31:33
23 he just wanted to make sure that every 11:31:36
24 department was doing their part with Ms. 11:31:39
25 Diamond, that -- because, like I said, he asked 11:31:45

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1	for it for every department so that he could	11:31:48
2	just stay abreast to any issues that may have	11:31:51
3	occurred.	11:31:54
4	MR. CHALMERS: Okay. Thank you,	11:32:14
5	Ms. Moody, I don't have any further questions.	11:32:15
6	THE WITNESS: Okay.	11:32:18
7	MR. FLEISHER: Ms. Moody, I just	11:32:19
8	have one or two more. I apologize, but we	11:32:20
9	really appreciate your patience.	11:32:24
10	THE WITNESS: That's fine.	11:32:27
11	- - -	11:32:27
12	FURTHER EXAMINATION BY MR. FLEISHER:	11:32:27
13	Q. A few minutes ago you were talking	11:32:28
14	about PREAs and I think you said hindsight is	11:32:29
15	2020 but there were some things you think should	11:32:33
16	have been done or could have been done. Could	11:32:37
17	you elaborate on that?	11:32:38
18	A. One of them meaning possibly	11:32:40
19	organizing with her lawyer to discuss the PREAs	11:32:42
20	that did occur. And I say that only because the	11:32:45
21	point of a PREA is to make sure that it doesn't	11:32:49
22	happen again, so if there were anything else	11:32:54
23	that we could have implemented based on the	11:32:56
24	scenario of it, to actually allow her to speak	11:32:59
25	even, you know, with the lawyer present.	11:33:03

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1	Q.	When you say her, again just for	11:33:06
2		clarity, you're talking about Ms. Diamond?	11:33:08
3	A.	Ms. Diamond, yes, sir.	11:33:10
4	Q.	And you talked a little bit about	11:33:12
5		Ms. Diamond's dorm earlier. Do you know, was	11:33:14
6		that dorm fully staffed with security staff?	11:33:18
7	A.	Yes. I do know that sometimes it	11:33:23
8		would be one officer to a building. I'm not too	11:33:32
9		familiar with the standards of security to say	11:33:35
10		that there should have been two officers versus	11:33:38
11		one but, yeah, there were definitely times where	11:33:42
12		there was, you know, a shortage on an officer	11:33:46
13		for that building.	11:33:49
14	Q.	There was a shortage of security	11:33:50
15		officers?	11:33:52
16	A.	Yes, sir.	11:33:53
17		MR. FLEISHER: I don't have	11:33:54
18		anything further. Thank you.	11:33:55
19		- - -	11:33:55
20		FURTHER EXAMINATION BY MR. CHALMERS:	11:33:55
21	Q.	Ms. Moody, did you know what the	11:34:01
22		required number of officers was for the dorm?	11:34:04
23	A.	No, sir.	11:34:08
24	Q.	To be clear, are you saying that	11:34:09
25		sometimes there was only one officer in the	11:34:13

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1	building?	11:34:17
2	A. Only one officer in the building;	11:34:18
3	sometimes only one officer for two buildings,	11:34:22
4	the one directly across from it. And I don't	11:34:25
5	know if that was an odd time of the shift or	11:34:28
6	just at certain times of the day.	11:34:31
7	MR. CHALMERS: Thank you. Nothing	11:34:38
8	further.	11:34:39
9	THE VIDEOGRAPHER: Anything	11:34:42
10	further?	11:34:44
11	MR. FLEISHER: Nothing further	11:34:46
12	from me. Thank you so much for your time, Ms.	11:34:46
13	Moody.	11:34:46
14	THE WITNESS: Thank you.	11:34:50
15	THE VIDEOGRAPHER: The time is	11:34:50
16	11:34 a.m. We are off the record. I am	11:34:52
17	stopping the recording now.	11:34:54
18	(Deposition concluded 11:34 a.m.)	11:37:22
19	-o0o-	
20		
21		
22		
23		
24		
25		

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ACKNOWLEDGMENT OF DEPONENT

I, PORSHE MOODY, do hereby
acknowledge that I have read and examined the
foregoing testimony and the same is a true,
correct and complete transcription of the
testimony given by me and any corrections appear
on the attached Errata sheet signed by me.

(Date)

(Signature)

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1 REPORTER'S CERTIFICATION

2
3 I, NANCY C. BENDISH, Certified
4 Court Reporter and Notary Public of the States
5 of New York and New Jersey, do hereby certify
6 that, prior to the commencement of the
7 aforementioned examination, PORSHE MOODY was
8 sworn by me to testify the truth, the whole
9 truth and nothing but the truth.

10 I DO FURTHER CERTIFY that the
11 foregoing is a true and accurate transcript of
12 the testimony as taken stenographically by and
13 before me at the time, place, and on the date
14 hereinbefore set forth.

15 I DO FURTHER CERTIFY that I am
16 neither a relative nor employee nor attorney nor
17 counsel of any party in this action and that I
18 am neither a relative nor employee of such
19 attorney or counsel, and that I am not
20 financially interested in the event nor outcome
21 of this action.

22 

23 NANCY C. BENDISH, CCR, RMR, CRR
24 Realtime Systems Administrator
Certificate No. XI00836

25 Dated: February 26, 2022

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**GEORGIA DEPARTMENT OF CORRECTIONS
SEXUAL ALLEGATION RESPONSE CHECKLIST**

Incident Date 6/18/20 Incident Time UNK Incident Report # 311169
 Victim Name* Diamond, Ashlee GDC ID#* 1000240305
 Location of Incident: W-5105 Date/Time Received: 7/7/20 11AM
 *If more than one victim, separate with a semi-colon

(Some actions may be performed out of sequence or simultaneously)

Activity/Actions	Yes	No	Date	Time	Comments
Medical examination of the alleged victim conducted per 208.06 Attachment 5?		<input checked="" type="checkbox"/>			late YPOA
If within 72 Hrs. was SANE contacted? (Or sent to hospital for forensic exam if SANE cannot arrive prior to 72 Hr. expiration.)		<input checked="" type="checkbox"/>			N/A
Separated alleged victim(s) from alleged aggressor(s) in accordance with SOP 208.06?		<input checked="" type="checkbox"/>			N/A
When was the local Sexual Abuse Response Team (SART) notified?	<input checked="" type="checkbox"/>		7/7/20	11AM	
Recover, download, and document any video monitoring recording. The disk will be identified using the corresponding incident report number, and stored securely.		<input checked="" type="checkbox"/>			N/A
Was evidence collected that needed to be forwarded to OPS? (To whom in comment)		<input checked="" type="checkbox"/>			N/A
Date Chain of custody form started?		<input checked="" type="checkbox"/>			N/A
Date incident demographic information form completed?	<input checked="" type="checkbox"/>		8/1/20		
Send PREA Initial notification	<input checked="" type="checkbox"/>		7/7/20		
Mental Health evaluation of the alleged victim completed within 24 Hrs. of receipt of the allegation in accordance with 508.22	<input checked="" type="checkbox"/>		7/7/20		
Have all related documents been scanned/entered into SCRIBE?	<input checked="" type="checkbox"/>		8/1/20		
Enter investigative summary with all necessary supporting documentation. (Enter date completed)	<input checked="" type="checkbox"/>		8/1/20		
Disciplinary actions taken	<input checked="" type="checkbox"/>				not a prea
Case file reviewed by PREA Compliance Manager	<input checked="" type="checkbox"/>		8/1/20		

P. Moody 1091828 Dwight Bettersen 107747
 SART Investigator Name Scribe ID PREA Compliance Manager SCRIBE ID

Allegation is: Unfounded Substantiated Unsubstantiated Forwarded to OPS Not PREA

Retention Schedule: Upon completion, this form shall be maintained as long as the alleged abuser is incarcerated or employed by the agency, plus five (5) years, or 10 years from the date of the initial report, whichever is greater.

02/25/22 - NH

Moody 1

